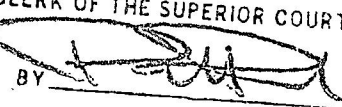


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BY 
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16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
17 **FOR THE COUNTY OF MERCED**

18 BARTOLA SANTIAGO, individually, and
19 on behalf of all others similarly situated,

20 *Plaintiff,*

21 v.

22 GREEN VALLEY LABOR, INC., a
23 California corporation; THE BURCHELL
24 NURSERY, INC., a California corporation;
25 and DOES 1 through 10, inclusive,

26 *Defendants.*

Case No.: 21CV-00413

CLASS ACTION

[Assigned for all purposes to: Hon. Stephanie L. Jamieson, Courtroom 8]

**JOINT STIPULATION REQUESTING
CONTINUANCE OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT
HEARING; [~~PROPOSED~~] ORDER**

Complaint filed: February 5, 2021
FAC Filed: January 14, 2022
Trial date: Not set

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1 This Joint Stipulation is made by and among Plaintiff Bartola Santiago (“Plaintiff”) and
2 Defendants Green Valley Labor, Inc. and The Burchell Nursery, Inc. (collectively, “Defendants”)
3 (collectively, “the Parties”), by and through their respective undersigned counsel of record, based
4 upon the following facts establishing good cause:

5 **WHEREAS**, on October 24, 2024, the court approved Plaintiff’s Motion for
6 Preliminary Approval of Class Action Settlement and set the hearing date for Motion for Final
7 Approval to February 6, 2024 at 8:15 a.m.;

8 **WHEREAS**, on January 30, 2025, the Court granted a brief continuance of the final
9 approval hearing date and a Case Management Conference to March 25, 2025 due to a delay
10 in delivering the class data to the Settlement Administrator;

11 **WHEREAS**, due to a further delay in the administration process, the Settlement
12 Administrator requires additional time to mail out class notices to the Class Members so that
13 Class Members Can object or exclude themselves from the settlement if they wish;

14 **WHEREAS**, due to the delay in the administration process, Plaintiff is in need of
15 additional time to prepare and file Plaintiff’s noticed Motion for Final Approval pursuant to
16 the timing requirements of the Code of Civil Procedure;

17 **WHEREAS**, after meeting and conferring and in consideration of the delayed class
18 administration, the Parties request a continuance of at least ninety (90) days of the hearing for
19 the Motion for Final Approval and the Case Management Conference to June 23, 2025, or at
20 a later date more convenient for the Court;

21 **THEREFORE**, the Parties, by and through their undersigned counsel of record, hereby
22 stipulate and agree, and respectfully request that the Court enter an order as follows:

23 1. The hearing for Plaintiffs’ Motion for Final Approval of Class Action Settlement
24 currently scheduled for March 25, 2025 at 8:15 a.m. shall be continued to June 23, 2025, or a
25 date thereafter deemed appropriate by the Court.

26 2. The Case Management Conference currently scheduled for March 25, 2025 at
27 8:15 a.m., shall be continued to June 23, 2025, or a date thereafter deemed appropriate by the
28 Court.

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Respectfully submitted,

Dated: March 4, 2025

WILSHIRE LAW FIRM

By: 
Benjamin H. Haber
Daniel J. Kramer

Dated: March 4, 2025

LITTLER MENDELSON, P.C.

By: */s/ Alejandra Gallegos*
Gerardo Hernandez
Alejandra Gallegos
Attorneys for Plaintiffs

Dated: March 4, 2025

COOK BROWN, LLP

By: */s/ Carrie E. Bushman*
Carrie E. Bushman
Attorneys for Defendant

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~~PROPOSED~~ ORDER

The Court having considered the Parties' Joint Stipulation Requesting Continuance of Plaintiff's Motion for Final Approval of Class Action Settlement Hearing, and good cause appearing, IT IS HEREBY ORDERED AS FOLLOWS:

1. The hearing for Plaintiff's Motion for Final Approval of Class Action Settlement currently scheduled for March 25, 2025 at 8:15 a.m., shall be continued to June 23, 2025 at 8:15 a.m.

2. The Case Management Conference currently scheduled for March 25, 2025 at 8:30 a.m., shall be continued to June 23, 2025 at 8:15 a.m.

Dated: 03/12/2025



Hon. Stephanie L. Jamieson
Judge of the Merced Superior Court

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