

FILED
Clerk of the Superior Court

DEC 20 2019

By: L. Dumo, Deputy

1 **HOGUE & BELONG**

2 Jeffrey L. Hogue (SBN 234557)
jhogue@hoguebelonglaw.com
3 Tyler J. Belong (SBN 234543)
tbelong@hoguebelonglaw.com
4 Erik A. Dos Santos (SBN 309998)
edossantos@hoguebelonglaw.com
170 Laurel Street
5 San Diego, CA 92101
Telephone No: (619) 238-4720
6

7 **LAW OFFICES OF DEVON K. ROEPCKE, PC**

8 Devon K. Roepcke (SBN 265708)
droepcke@lawdkr.com
170 Laurel Street
9 San Diego, CA 92101
Telephone No: (619) 940-5357

10 Attorneys for Plaintiff

11 **LEWIS BRISBOIS BISGAARD & SMITH LLP**

12 Jeffrey Ranen (SBN 224285)
jeffrey.ranen@lewisbrisbois.com
13 Katherine C. Den Bleyer (SBN 257187)
katherine.denBleyker@lewisbrisbois.com
14 Jack Jimenez (SBN 251648)
jack.jimenez@lewisbrisbois.com
15 633 West 5th Street, Suite 4000
Los Angeles, California 90071
16 Tel: (213) 250-1800
Fax: (213) 250-7900

17 Attorneys for Defendants

18
19 SUPERIOR COURT OF THE STATE OF CALIFORNIA

20 COUNTY OF SAN DIEGO, NORTHERN DIVISION

21
22 AZIZI BARANAUSKAS, individually and on
behalf of all others similarly situated,

23 Plaintiffs,

24 vs.

25 HEALTHCARE MANAGEMENT
26 SERVICES, LLC, a California limited liability
company; MEK ARDEN, LLC, a California
27 limited liability company; MEK
ASSOCIATES, LLC, a California limited

CASE NO. 37-2017-00013171-CU-OE-NC
[Assigned for All Purposes to:
The Hon. Timothy M. Casserly, Dept. N-31]

CLASS ACTION

**STIPULATION AND ORDER
MODIFYING DATES PERTAINING TO
THE NOTICE AND FINAL APPROVAL
OF THE CLASS ACTION SETTLEMENT**

1 liability company; MEK ESCONDIDO, LLC,
2 a California limited liability company; MEK
3 KENNEDY, LLC, a California limited
4 liability company; MEK L.V. PROPERTY,
5 LLC, a California limited liability company;
6 MEK LEISURE GLEN, LLC, a California
7 limited liability company; MEK LONG
8 BEACH, LLC, a California limited liability
9 company; MEK NORWOOD PINES, LLC, a
10 California limited liability company; MEK
11 OFFICE PROPERTY, LLC, a California
12 limited liability company; MEK PALOMAR
13 PROPERTY, LLC, a California limited
14 liability company; MEK R.O. PROPERTY,
15 LLC, a California limited liability company;
16 MEK SACRAMENTO, LLC, a California
17 limited liability company; and DOES 1
18 through 300, inclusive,

19
20
21
22
23
24
25
26
27
28
Defendants.

Action Filed: April 7, 2017
Trial Date: None Set

THIS STIPULATION and ORDER is hereby entered into by and between Plaintiff Azizi Baranauskas (“Plaintiff”), on behalf of herself and all others similarly situated to her, on the one hand, and Defendants Healthcare Management Services, LLC; MEK Arden, LLC; MEK Associates, LLC; MEK Escondido, LLC; MEK Kennedy, LLC; MEK L.V. Property, LLC; MEK Leisure Glen, LLC; MEK Long Beach, LLC; MEK Norwood Pines, LLC; MEK Office Property, LLC; MEK Palomar Property, LLC; MEK R.O. Property, LLC; MEK Sacramento LLC; Palomar Heights Care Center, LLC; and B.V. General, Inc. (“Defendants”), on the other hand, and through their respective counsel of record. Plaintiff and Defendants will be collectively referred to as the “Parties.”

WHEREAS, on November 1, 2019, the Court granted preliminary approval of the class action settlement entered into by the Parties and ordered a schedule of dates for the class notice and final approval of the settlement;

WHEREAS, pursuant to the Court’s November 1, 2019 order, Defendants were to provide the class list to the third party administrator, CPT Group, Inc. (“CPT”) by no later than November 15, 2019 and CPT was to mail the Notice Packet to the Class Members no later than November

1 25, 2019;

2 WHEREAS, due to inaccuracies in the class data Defendants provided to CPT which
3 necessitated several rounds of corrections, the class list was not complete until December 19,
4 2019;

5 WHEREAS, due to the delay in getting a complete class list to CPT the mailing date for
6 the Notice Packet, the notice deadline, the deadline to file the final approval motion, and the final
7 approval hearing date specified in the Court's November 1, 2019 order must all be modified.

8 NOW THEREFORE, the Parties hereby stipulate as follows:

9 1. The schedule of dates pertaining to the notice and final approval of the class action
10 settlement is hereby modified as follows:

Event	Date
Settlement Administrator to mail the Notice Packet to the Class Members no later than:	December 26, 2019
Deadline for Class Members to submit disputes, request exclusion from, or object to the Settlement:	February 10, 2020
Deadline for Plaintiff to file Motion for Final Approval of Class Action Settlement:	March 5, 2020
Final Approval hearing:	March 27, 2020 at 1:30 p.m.

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

2. All other terms of the Court's November 1, 2019 order shall remain unchanged.

[REMAINDER OF PAGE LEFT INTENTIONALLY BLANK]

[SIGNATURES ON FOLLOWING PAGE]

1 Dated: December 20, 2019

HOGUE & BELONG
LAW OFFICES OF DEVON K. ROEPCKE, PC

2
3 By: Devon K. Roepcke

4 Jeffrey L. Hogue
5 Tyler J. Belong
6 Devon K. Roepcke
7 Attorneys for Plaintiff, the Class, and
8 the Aggrieved Employees

9 Dated: December 20, 2019

LEWIS BRISBOIS BISGAARD & SMITH LLP

10
11 By: [Signature]

12 Jeffrey S. Ranen
13 Katherine C. Den Bleyker
14 Jack E. Jimenez
15 Attorneys for Defendants

16
17 **ORDER**

18 GOOD CAUSE appearing therefore, it is hereby SO ORDERED.

19
20 **Timothy M. Casserly, Judge**

21 DATED: December 20, 2019

22 HON. TIMOTHY M. CASSERLY
23 Judge of the San Diego County Superior Court