

Fax Filed

1 ACKERMANN & TILAJEF, P.C.
2 Craig J. Ackermann (SBN 229832)
3 cja@ackermanntilajef.com
4 Avi Kreitenberg (SBN 266571)
5 ak@ackermanntilajef.com
6 315 South Beverly Drive, Suite 504
7 Beverly Hills, California 90212
8 Telephone: (310) 277-0614
9 Facsimile: (310) 277-0635

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT

JUL 17 2023

BY *Victoria Sanchez*
VICTORIA SANCHEZ, DEPUTY

10 [additional counsel listed on following page]

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA

12 FOR THE COUNTY OF SAN BERNARDINO

13 JULIO VILLAZON and LORENA
14 DUARDO, individually and on behalf of all
15 others similarly situated,

16 Plaintiffs,

17 v.

18 SADDLEBACK ROOFING, INC., a
19 California Corporation,

20 Defendant.

Case No. CIVSB2307262

**JOINT STIPULATION TO CONTINUE
OCTOBER 4, 2023 FINAL APPROVAL
HEARING; [PROPOSED] ORDER**

*Assigned for all purposes to the Honorable
Joseph T. Ortiz, Dept. S-17*

Date: October 4, 2023
Time: 8:30 a.m.
Dept.: S-17

Complaint Filed: March 16, 2023
Trial Date: None Set

21 ///
22 ///
23 ///
24 ///
25 ///
26 ///
27 ///

1 **LAW OFFICE OF TATIANA HERNANDEZ, P.C.**

2 Tatiana Hernandez (SBN 255322)
3 tatiana@thawpc.com
4 315 South Beverly Drive, Suite 504
5 Beverly Hills, California 90212
6 Telephone: (213) 909-4248
7 Facsimile: (310) 388-0639

8 **THE WAND LAW FIRM, P.C.**

9 Aubry Wand (SBN 281207)
10 awand@wandlawfirm.com
11 100 Oceangate, Suite 1200
12 Long Beach, California 90802
13 Telephone: (310) 590-4503

14 *Attorneys for Plaintiffs, the Putative Class, the LWDA, and the Aggrieved Employees*

15 **NEWMAYER & DILLION LLP**

16 Michael Studenka (SBN 204956)
17 michael.studenka@ndlf.com
18 895 Dove Street, 2nd Floor
19 Newport Beach, CA 92660
20 Telephone: 949-854-7000
21 Facsimile: 949-854-7099

22 *Attorneys for Defendant Saddleback Roofing, Inc.*

23
24
25
26
27
28

1 **TO THE HONORABLE COURT:**

2 Plaintiffs JULIO VILLAZON and LORENA DUARDO (“Plaintiffs”) and Defendant
3 SADDLEBACK ROOFING, INC. (“Defendant”), (collectively referred to as the “Parties”), by and
4 through their respective counsel of record, and in accordance with California Rules of Court, Rule
5 3.1332(c), hereby jointly stipulate to continue the October 4, 2023 Final Approval Hearing to December
6 13, 2023, or as soon thereafter as this matter may be heard in Dept. S-17 of the above-entitled Court.

7 **RECITALS**

8 WHEREAS, the Parties attended mediation on February 10, 2023;

9 WHEREAS, the Parties resolved this case on a class and PAGA basis;

10 WHEREAS, the Parties just received the Court’s Order Granting Preliminary Approval of Class
11 Action Settlement on July 6, 2023;

12 WHEREAS, the Court has set the Final Approval Hearing for October 4, 2023;

13 WHEREAS, it will take approximately thirty (30) days for Defendant, working diligently with
14 Defendant’s payroll provider, to obtain the class data to be provided to the settlement administrator;

15 WHEREAS, it will take approximately thirty (30) days for the settlement administrator to
16 process the class data and mail out the Class Notices;

17 WHEREAS, once the Class Notices are mailed, the Class Members will have sixty (60) days
18 within which to opt out or object to the Settlement;

19 WHEREAS, based on the timeframe above, it will take approximately 120 days, or until
20 approximately mid-November 2023, to complete the notice process contemplated under the settlement
21 agreement;

22 WHEREAS, it will take approximately 30 days for Plaintiffs, working diligently with the
23 settlement administrator, to draft and file the Motion for Final Approval;

24 WHEREAS, the Parties respectfully submit that judicial economy would be best served if the
25 currently scheduled Final Approval Hearing of October 4, 2023 is continued to December 13, 2023, or
26 as soon thereafter as this matter may be heard.

27 **IT IS HEREBY STIPULATED** by and between the Parties that:

28 1. Pursuant to the Court’s availability, the October 4, 2023 Final Approval Hearing date be

1 continued to December 13, 2023, or to a date shortly thereafter which is convenient for the Court.

2 **IT IS SO STIPULATED.**

3

4 DATE: July 12, 2023

ACKERMANN & TILAJEF, P.C.

5

6

By: *Avi Kreitenberg*
CRAIG J. ACKERMANN
AVI KREITENBERG
Attorneys for Plaintiffs, the Putative Class, the
LWDA, and the Aggrieved Employees

7

8

9

10 DATE: July 12, 2023

LAW OFFICE OF TATIANA HERNANDEZ, P.C

11

12

13

By: *Tatiana Hernandez*
TATIANA HERNANDEZ
Attorneys for Plaintiffs, the Putative Class, the
LWDA, and the Aggrieved Employees

14

15


16

17 DATE: July 12, 2023

THE WAND LAW FIRM, P.C.

18

19

By: 
AUBRY WAND
Attorneys for Plaintiffs, the Putative Class, the
LWDA, and the Aggrieved Employees

20

21


22

23 DATE: July 12, 2023

NEWMAYER & DILLION LLP

24

25

By: 
MICHAEL STUDENKA
Attorneys for Defendant Saddleback Roofing,
Inc.

26

27

28

[PROPOSED] ORDER

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Upon consideration of the Parties' stipulation, and good cause appearing therefore,

IT IS HEREBY ORDERED THAT:

1. The present Final Approval Hearing date scheduled for October 4, 2023, is continued to
December 13 at 1:30 pm in Department S-17.

DATED: 7/17/23



HON. JOSEPH T. ORTIZ
JUDGE OF THE SUPERIOR COURT