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14 d/b/a Old Town Pub and Grub, Erin Ryder and Edwards
Ryder III

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **COUNTY OF RIVERSIDE**

17 TRISTA HOOD, individually and on behalf of
18 all similarly situated employees of Defendants
in the State of California,

19 Plaintiff,

20 v.

21
22 E&E RYDER, LLC, PUB AND GRUB d/b/a
23 OLD TOWN PUB AND GRUB, ERIN
RYDER AND EDWARD RYDER III, and
24 DOES 1 THROUGH 50, inclusive,

25 Defendants.

Case No.: CVRI2300296

[Assigned for all purposes to the Honorable
Harold W. Hopp, Department 1]

CLASS & REPRESENTATIVE ACTION

**JOINT STIPULATION AND [~~PROPOSED~~]
ORDER TO CONTINUE PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF
CLASS AND PAGA ACTION SETTLEMENT**

Dept: 1
Judge: Hon. Harold W. Hopp

Complaint Filed: January 19, 2023
FAC Filed: March 6, 2023
Trial Date: None set

Electronically RECEIVED by Superior Court of California, County of Riverside on 09/06/2024 12:39 PM - Jason B. Galkin, Executive Officer/Clerk of the Court By Araceli Amezcua, Clerk
GRAHAMHOLLIS APC
3555 FIFTH AVENUE SUITE 200
SAN DIEGO, CALIFORNIA 92103

1 Plaintiff Trista Hood (“Plaintiff”) and Defendants E&E Ryder, LLC, Pub and Grub d/b/a Old
2 Town Pub and Grub, Erin Ryder, and Edward Ryder III (“Defendants”) (collectively, the “Parties”), by
3 and through their counsel of record, respectfully submit this Joint Stipulation to Continue the October 18,
4 2024 Hearing on Plaintiff’s Motion for Final Approval of Class Action and PAGA Settlement and request
5 that the Court approve and enter an order in accordance with this stipulation:

6 WHEREAS, on July 16, 2024, this Court entered an order granting Plaintiff’s Unopposed Motion
7 for: (1) Preliminary Approval of Class Action and PAGA Representative Action Settlement; (2)
8 Conditional Certification of the Settlement Class; (3) Appointment of the Class Representative; (4)
9 Appointment of Class Counsel; (5) Approval of Class Notice; (6) Appointment of Settlement
10 Administrator; and (7) Setting a Final Approval Hearing;

11 WHEREAS, the Court scheduled the hearing on Plaintiff’s Motion for Final Approval of Class
12 Action Settlement and Award for Attorney’s Fees, Costs, and Class Representative Service Award on
13 October 18, 2024 at 8:30 a.m. in Department 1 of the above-entitled Court (“Plaintiff’s Motion for Final
14 Approval”);

15 WHEREAS, the Parties have worked diligently to provide the Settlement Administrator with the
16 required information to transmit the Court-approved Class Notice to class members in a timely manner;

17 WHEREAS, the Parties have met and conferred and agree that the current date for Plaintiff’s
18 Motion for Final Approval hearing, October 18, 2024, does not allow sufficient time for the completion
19 of the settlement administration including, notifying class members of the proposed class action and
20 allowing class members to dispute, object, or opt-out of the settlement, prior to the deadline for Plaintiff
21 to file and serve his motion;

22 WHEREAS, in the interest of the class members of the proposed class action, the Parties believe
23 the October 18, 2024 hearing on Plaintiff’s Motion for Final Approval should be continued to a date in
24 January of 2025 to ensure the class members are provided notice of the proposed class action settlement
25 and have sufficient time to dispute, object, or opt-out of the proposed settlement prior to the October 18,
26 2024 hearing;

27 THEREFORE, the Parties jointly stipulate and respectfully request that this Court enter an order
28 continuing the October 18, 2024 hearing on Plaintiff’s Motion for Final Approval to a date in January of

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1 2025.

2 **IT IS SO STIPULATED.**

3 Respectfully submitted,

4 Dated: August 28, 2024

GRAHAMHOLLIS APC

5
6 By: 

VILMARIE CORDERO

TAYLOR M. GEE

Attorneys for Plaintiff Trista Hood

8
9 Dated: August 28, 2024

REID & HELLYER APC

10
11 By: 

Douglas A. Plazak, Esq.

Jenna Acuff, Esq.

Attorneys for Defendants E&E Ryder LLC, Pub
and Grub d/b/a Old Town Pub and Grub, Erin
Ryder and Edwards Ryder III

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~~PROPOSED~~ ORDER

After review and consideration of the foregoing stipulation, and good cause appearing, it is ordered that the October 18, 2024 hearing on Plaintiff's Motion for Final Approval in the above-captioned matter shall be continued to February 14, 2025 at 11:00 a.m./p.m. in Department 1 of the above-entitled Court.

IT IS SO ORDERED.

[Signature]

[Signature]

Dated: _____

Hon. Harold Hopp
Judge of the Superior Court

SUPERIOR COURT OF THE STATE OF CALIFORNIA COUNTY OF RIVERSIDE		FOR COURT USE ONLY
TITLE OF CASE (ABBREVIATED): <i>Trista Hood v. E&E Ryder, LLC, et al.</i>		Electronically FILED by Superior Court of California, County of Riverside on 08/29/2024 12:39 PM Case Number CVRI2300296 0000103619344 - Jason B. Galkin, Executive Officer/Clerk of the Court By Araceli Amezcua, Clerk
ATTORNEY(S) NAME AND ADDRESS: Vilmarie Cordero, Esq. (SBN: 268860) Taylor M. Gee, Esq. (SBN: 349199) Graham Hollis APC 3555 Fifth Avenue Suite 200 San Diego, California 92103		TELEPHONE 619.692.0800 FACSIMILE 619.692.0822
ATTORNEYS FOR: Plaintiff Trista Hood	HEARING: DATE-TIME-DEPT	CASE NUMBER CVRI2300296

PROOF OF SERVICE

I, Florence L. Goldson, declare: that I am, and was at the time of service of the papers herein referred to, over the age of 18 years, and not a party to the action; and I am employed in the County of San Diego, California, within which county the subject service occurred. My business address is 3555 Fifth Avenue Suite 200, San Diego, California, 92103. On August 29, 2024, I served the following document(s):

- **JOINT STIPULATION AND [PROPOSED] ORDER TO CONTINUE PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT**

Upon:

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Attorneys for Defendants E&E Ryder, LLC., Pub and Grub d/b/a Old Town Pub and Grub, Erin Ryder, and Edward Ryder III

- (BY ELECTRONIC TRANSMISSION)** I hereby certify that the above-referenced document(s) were served electronically on the parties listed herein at their most recent known email address or email of record by submitting an electronic version of the document(s) to Info Track or One Legal, LLC, through the online user interface per rule of court, court order, or the parties' agreement to accept service by electronic transmission.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on August 29, 2024, in San Diego, California.



Florence L. Goldson