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10 Attorneys for Plaintiff, DONALDO MUNOZ GARCIA,  
11 on behalf of himself and all others similarly situated and  
12 aggrieved

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
14 FOR THE COUNTY OF ORANGE

15 DONALDO MUNOZ GARCIA, an  
16 individual, and on behalf of all others  
17 similarly situated,

18 Plaintiff,

19 v.

20 ALL COUNTY ENVIRONMENTAL &  
RESTORATION, INC., a California  
21 corporation; DONALD MOSER, an  
individual; and DOES 1 through 100,  
22 inclusive,

23 Defendants.

CASE NO.: 30-2021-01236384-CU-OE-CXC

Assigned for all purposes to the  
Hon. Melissa R. McCormick in Dept. CX105

**JOINT STIPULATION TO  
CONTINUE HEARING DATE FOR  
MOTION FOR FINAL APPROVAL  
AND FILING DEADLINE; ORDER  
THEREON**

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5 Facsimile: (818) 230-4251  
  
6 Attorneys for Defendants  
ALL COUNTY ENVIRONMENTAL &  
7 RESTORATION, INC. and DONALD MOSER  
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1 Plaintiff Donaldo Munoz Garcia (“Plaintiff”) and defendants All County Environmental  
2 & Restoration, Inc. and Donald Moser (“Defendants”) (collectively, the “Parties”), by and  
3 through their respective counsel of record, hereby jointly agree and stipulate to the following:

4 WHEREAS, a hearing on Plaintiff’s Motion for Final Approval of Class and  
5 Representative Action Settlement (“Motion”) in this matter currently is scheduled for July 10,  
6 2025 at 2:00 p.m. in the above-entitled Court.

7 WHEREAS, due to data discrepancies in the data which Defendants provided to the  
8 settlement administrator, the Notice of Class Action Settlement (“Class Notice”), the mailing of  
9 the Class Notice was delayed.

10 WHEREAS, the Settlement Administrator has informed the Parties it has all necessary  
11 data and will mail the Class Notice three to five business days after the Parties receive a new  
12 hearing date.

13 WHEREAS, the Parties agree that the hearing on Plaintiff’s Motion must be continued  
14 to allow for administration of the Class Notice.

15 Accordingly, the Parties stipulate and respectfully request:

16 (1) The hearing on Plaintiff’s Motion currently scheduled for July 10, 2025 at 2:00  
17 p.m. be continued by ninety (90) days, or a date thereafter that is convenient to the  
18 Court; and

19 (2) The deadline for Plaintiff to file the Motion shall be similarly continued and  
20 shall be filed pursuant to the Code of Civil Procedure.

21 IT IS SO STIPULATED.

22 DATE: June 12, 2025

BIBIYAN LAW GROUP, P.C.

23  
24 By: /s/ Brandon M. Chang  
25 VEDANG J. PATEL  
26 BRANDON M. CHANG  
27 Attorneys for Plaintiff  
28 DONALDO MUNOZ GARCIA on behalf of  
himself and all other similarly situated

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DATE: June 12, 2025

FISHER & PHILLIPS LLP

By: /s/ Lirit A. King  
Hannah Sweiss  
Lirit A. King  
Attorneys for Defendants  
ALL COUNTY ENVIRONMENTAL &  
RESTORATION, INC. and DONALD MOSER

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ORDER

Based on the above stipulation of the parties, it is hereby ordered as follows:

(1) The hearing on Plaintiff's Motion for Final Approval currently scheduled for July 10, 2025 at 2:00 p.m. is continued to October 16, 2025 at 2:00 p.m. in Department CX105; and

(2) Plaintiff shall file his Motion for Final Approval at least 16 court days before the hearing.

**IT IS SO ORDERED.**

6/16/25 \_\_\_\_\_



\_\_\_\_\_  
MELISSA R. MCCORMICK  
Judge of the Superior Court

## PROOF OF SERVICE

## STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my mailing address is 1460 Westwood Blvd., Los Angeles, California 90024.

On June 16, 2025, and pursuant to Code of Civil Procedure section 1010.6, I caused a true and correct copy of the foregoing document(s) described as JOINT STIPULATION TO CONTINUE HEARING DATE FOR MOTION FOR FINAL APPROVAL AND FILING DEADLINE; AND [PROPOSED] ORDER to be served by electronic transmission to the below-referenced electronic email addresses as follows:

Hannah Sweiss  
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**21600 Oxnard Street Suite 650**  
**Woodland Hills, CA 91367**

Counsel for Defendants, All County Environmental & Restoration, Inc., and Donald Moser

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 16, 2025, at Los Angeles, California.

/s/Jennifer Echeverria  
Jennifer Echeverria