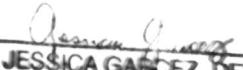


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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT

SEP 16 2025

BY 
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13 *Counsel for Defendants on following page:*

14
15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **FCOUNTY OF SAN BERNARDINO**

17 MARIANA ZUAZO, an individual,
18 Plaintiff,
19 vs.

20 ROMEO & LAYLA WAREHOUSING,
21 INC., a California corporation; FAIRWAY
STAFFING SERVICES, a California
22 corporation; ULTRA PERSONNEL, LLC, a
California limited liability company; and
23 DOES 1 through 50, inclusive,
24 Defendants.

Case No.: CIVSB2307282

CLASS ACTION

Assigned for All Purposes To:

Hon. Joseph T. Ortiz

Dept.: S-17

**JOINT STIPULATION TO CONTINUE
FINAL APPROVAL HEARING;
[PROPOSED] ORDER**

Date: November 12, 2025

Time: 1:30 p.m.

Dept: S-17

Original Complaint filed: March 15, 2023

First Amended Complaint: May 19, 2023

Second Amended Complaint: TBD

Trial Date: None set.

1 [continued from previous page]:

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22 ULTRA PERSONNEL, LLC

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1 **TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:**

2 Plaintiff MARIANA ZUAZO (hereinafter “Plaintiff”) and Defendants ROMEO &
3 LAYLA WAREHOUSING, INC. (“R&L”), FAIRWAY STAFFING SERVICES (“Fairway”),
4 and ULTRA PERSONNEL, LLC (“Ultra”) (R&L, Fairway and Ultra are each a “Defendant” and
5 collectively, “Defendants”) (Plaintiff and Defendants collectively, the “Parties”) hereby stipulate
6 and respectfully request that the Court reschedule the Final Approval hearing scheduled for
7 November 12, 2025, at 1:30 p.m. based on the following:

- 8 1. Plaintiff filed this action as a putative wage and hour class action against her alleged
9 former employer, Defendants. Plaintiff also asserted claims under the Private Attorney
10 General Act of 2004, Labor Code § 2698 *et seq.* (“PAGA”);
- 11 2. In or about November 2024, the Parties entered into a Class and PAGA Action
12 Settlement Agreement and Release (“Settlement Agreement”);
- 13 3. On or about April 2025, counsel for Plaintiff filed a motion for preliminary approval of
14 the class and PAGA action settlement;
- 15 4. On or about June 11, 2025, the Court granted Plaintiff’s motion for preliminary
16 approval of the class and PAGA action settlement and thereafter entered an order
17 granting such motion and further setting a hearing date for Plaintiff’s anticipated
18 motion for final approval for November 12, 2025;
- 19 5. There have been delays preparing a complete settlement class list with accurate
20 workweek and PAGA pay period counts since some of the records that are needed to
21 derive accurate individual totals have been difficult to procure for Defendant Ultra; and
- 22 6. To ensure the accuracy and completeness of the class list, the Parties hereby request
23 that the final approval hearing be continued for four weeks.

24 NOW THEREFORE, the Parties hereby stipulate and respectfully request that the Court
25 reschedule the final approval hearing date from November 12, 2025, to December 10, 2025, or
26 the Court’s earliest available hearing date thereafter.

27 **IT IS SO STIPULATED.**

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DATED: September 4, 2025

DAVID YEREMIAN & ASSOCIATES, INC.
D.LAW, INC.

By: /s/Antonia McKee
David Yeremian
Alvin B. Lindsay
Enoch J. Kim
Rose Sorial
Antonia McKee
Attorneys for Plaintiff MARIANA
ZUAZO and the class

DATED: September 4, 2025

DAVIS WRIGHT TREMAINE LLP

By: /s/Evelyn Wang
Evelyn Wang
Frances Choi
Attorneys for Defendant ROMEO &
LAYLA WAREHOUSING, INC

DATED: September 4, 2025

LIGHTGABLER LLP

By: /s/ Chandra A. Beaton
Jonathan Fraser Light
Chandra A. Beaton
Attorneys for Defendant FAIRWAY
STAFFING SERVICES

DATED: September 4, 2025

SOLEIMAN APC

By: /s/ Bradley S. Beherens
Matthew Soleimanpour
Bradley S. Beherns
Attorneys for Defendant Ultra
Personnel, LLC

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~~PROPOSED~~ ORDER

IT IS HEREBY ORDERED, pursuant to stipulation of the Parties and with good cause appearing, that the hearing on Plaintiff's Motion for Final Approval of the Parties' Class and PAGA Action Settlement Agreement scheduled in this Action for November 12, 2025, is rescheduled as requested to: December 10, 2025 at 1:30 pm.

IT IS SO ORDERED.

Date: Sept. 16, 2025

Joseph T. Ortiz
Joseph T. Ortiz
Superior Court Judge

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES:

3 I am employed in the aforesaid county, State of California; I am over the age of 18 years
4 and not a party to the within action; my business address is 450 N Brand Blvd., Ste 840,
Glendale, CA 91203.

5 On September 4, 2025, I served the foregoing: **JOINT STIPULATION TO**
6 **CONTINUE FINAL APPROVAL HEARING; [PROPOSED] ORDER** on Interested Parties
in this action by placing a true copy thereof, enclosed in a sealed envelope, addressed as follows:

7 Evelyn Wang
8 evelynwang@dwt.com
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11 Raina Singer
12 rainasinger@dwt.com
13 Frances Choi
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Counsel for Defendant,
ROMEO & LAYLA
WAREHOUSING, INC.

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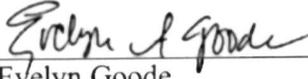
Counsel for Defendant,
ULTRA PERSONNEL, LLC

29 **(BY MAIL)** I placed such envelope with postage thereon fully paid in the United States
30 mail at Glendale, California. I am "readily familiar" with this firm's practice of collecting and
31 processing correspondence for mailing. It is deposited with U.S. Postal Service on that same day
32 in the ordinary course of business. I am aware that on motion of party served, service is
33 presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of
deposit for mailing in affidavit.

34 **(COURTESY COPY BY ELECTRONIC TRANSMISSION)** by use of email by
scanning the documents and any and all documents and emailing them to email addresses above.

35 **(STATE)** I certify (or declare) under penalty of perjury under the laws of the State of
36 California that the foregoing is true and correct.

37 Executed on September 4, 2025, at Glendale, California.

38 
Evelyn Goode