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**FILED**  
 SUPERIOR COURT of CALIFORNIA  
 COUNTY of SANTA BARBARA  
**01/22/2026**  
 Darrel E. Parker, Executive Officer  
 BY Chavez, Terri  
 Deputy Clerk

7 *Attorneys for Plaintiffs*

8 [Additional Counsel on next page]

9  
 10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
 11 **FOR THE COUNTY OF SANTA BARBARA**

12 CEDRIC A. BEATY and JORGE L.  
 13 ZARAGOZA VALDOVINOS, individually, and  
 14 on behalf of all others similarly situated,

15 Plaintiffs,

16 v.

17 HOMER T. HAYWARD LUMBER CO., a  
 California corporation; UNITED STAFFING  
 18 ASSOCIATES, LLC, a California limited  
 liability company; and DOES 1 through 10,  
 19 inclusive,

20 Defendants.

Case No.: 22CV04267

[Assigned for all purposes to: Hon. Donna D. Geck, Dept. 4]

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

Complaint filed: October 28, 2022  
 Trial date: None Set

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Attorneys for Defendant Homer T. Hayward Lumber Co., and United Staffing  
Associates, LLC

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

2 Plaintiffs CEDRIC A. BEATY and JORGE L. ZARAGOZA VALDOVINOS (“Plaintiffs”)  
3 and Defendants HOMER T. HAYWARD LUMBER CO. and UNITED STAFFING  
4 ASSOCIATES, LLC (“Defendants,” and together with Plaintiff, the “Parties”), by and through  
5 their respective counsel of record, hereby enter into the stipulation below with reference to the  
6 following facts:

7 **WHEREAS**, the Court granted Preliminary Approval of Class Action and PAGA  
8 Settlement at the hearing on Plaintiff’s Motion on or around August 26, 2025;

9 **WHEREAS**, the Court set the hearing on Plaintiff’s Motion for Final Approval (“MFA  
10 hearing”) for November 21, 2025;

11 **WHEREAS**, the Parties filed a Stipulation to continue the November 21, 2025 MFA  
12 hearing date on October 31, 2025;

13 **WHEREAS**, on November 4, 2025 the Court granted the Parties’ Stipulation and set a  
14 hearing date for Plaintiffs’ MFA for March 27, 2026;

15 **WHEREAS**, on December 9, 2025, the Parties appeared at Plaintiffs’ *Ex Parte* Application  
16 for Order Compelling Defendant to Provide the Class List to the Administrator (“*Ex Parte*”). On  
17 the same date, the Court granted the *Ex Parte* and ordered Defendants to produce the Class List to  
18 the Administrator, Apex Class Action, on or before December 31, 2025;

19 **WHEREAS**, on December 31, 2025, Defendants produced the Class List;

20 **WHEREAS**, based on the date the Administrator received the Class List, the hearing date  
21 for Plaintiffs’ MFA for March 27, 2026 does not provide sufficient time for the Parties to complete  
22 the class notice process;

23 **WHEREAS**, the Parties need additional time to complete the class notice process;

24 **WHEREAS**, the Parties have met and conferred and agreed, subject to Court approval, to  
25 continue the MFA hearing to May 4, 2026, or as soon thereafter as may be heard by this Court.

26 **THEREFORE**, the Parties, by and through their undersigned counsel of record, hereby  
27 stipulate and respectfully request that the Court enter an order as follows:  
28



~~PROPOSED~~ ORDER

The Court, having considered the Parties' Joint Stipulation to Continue Hearing on Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement, and good cause appearing, HEREBY ORDERS AS FOLLOWS:

1. The hearing on Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement is continued from March 27, 2026 to 5/8/2026, at 10:00 a.m. in Department 4.

**IT IS SO ORDERED.**

DATED: 01/22/2026, 2026



Honorable Donna D. Geck  
Judge of the Superior Court

