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Filed
March 19, 2026
Clerk of the Court
Superior Court of CA
County of Santa Clara
22CV403855
By: afloresca

3/19/2026 11:24:41 AM

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

ANTHONE REINKE and JARRETT CHOW,
individually, and on behalf of all others similarly
situated,

Plaintiffs,

v.

MGE UNDERGROUND, INC., a California
Corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: 22CV403855

*[Assigned for All Purposes to the Hon.
Theodore C. Zayner, Dept. 19]*

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO CONTINUE
THE HEARING ON PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT AND REVISE THE
IMPLEMENTATION SCHEDULE**

Action Filed: September 29, 2022

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MGE UNDERGROUND, INC.

STIPULATION

Plaintiffs Jarrett Chow and Daniel Enriquez Ulloa (collectively “Plaintiffs”), and Defendant MGE Underground, Inc. (“Defendant”) (Plaintiffs and Defendant collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, on September 22, 2025, Plaintiffs filed a Motion for Preliminary Approval of Class Action and PAGA Settlement;

WHEREAS, on October 8, 2025, Plaintiffs’ Motion for Preliminary Approval of Class Action and PAGA Settlement was heard by the Court and granted on the condition that the Parties make a specific addition to the Class Notice prior to its mailing;

WHEREAS, the Parties made the specific addition to the Class Notice however, the Class Notice has not yet been sent and there is now insufficient time to complete the class notice administration process in advance of the current hearing date for Plaintiffs’ Motion for Final Approval of Class Action and PAGA Settlement;

WHEREAS, Defendant provided the Class Data to the Administrator on March 11, 2026, and the Administrator confirmed receipt;

WHEREAS, given the inadvertent delay, the Parties have agreed to file a stipulation requesting that the Court continue the hearing date for Plaintiffs’ Motion for Final Approval of Class Action and PAGA Settlement by approximately 60 days and reset the attendant due dates in accordance with the Settlement Agreement.

THEREFORE, THE PARTIES STIPULATE AND AGREE AS FOLLOWS:

1. The Parties agree to the dates from the MPA Order being reset as follows, consistent with the Settlement Agreement:

Event	Original Date	New Date
Class Notice: Last day for the Administrator to mail the Class Notice to Class Members	November 6, 2025	14 days after receipt of the Class Data

Response Deadline: Last day for Class Members to object to the Settlement or opt out of the Settlement	December 21, 2025	45 days after mailing of Class Notice (with an additional 14 days for Class Members whose Class Notice was remailed)
Filing Deadline: Last day to file the Motion for Final Approval, Request for Attorneys' Fees and Costs, and Class Representative Service Payments to Plaintiffs	March 30, 2026	16 court days prior to the Final Approval Hearing
Final Approval Hearing	April 22, 2026, at 2:30 p.m. in Dept. 19	June 18, 2026, at _____ a.m./p.m. or the next available date and time more convenient for the Court: July 8, 2026 at <u>1:30</u> a.m./p.m., in Dept. 19 of the above-referenced Court.

IT IS SO STIPULATED.

Dated: March 17, 2026

WILSHIRE LAW FIRM, PLC

By: /s/ Courtney M. Miller

Jeffrey C. Bils
Emily K. Borman
Courtney M. Miller
Attorneys for Plaintiff
JARRETT CHOW

1 Dated: March 17, 2026

D.LAW, INC.

2
3 By: /s/ Matthew J. Carraher

4 Natalie Haritounian
5 Matthew J. Carraher
6 Attorneys for Plaintiff
7 DANIEL ENRIQUEZ ULLOA

8
9 Dated: March 17, 2026

**GORDON REES SCULLY MANSUKHANI,
LLP**

10 By: /s/ Nicholas A. Deming

11 Marcie Isom Fitzsimmons
12 Nicholas A. Deming
13 Attorneys for Defendant
14 MGE UNDERGROUND, INC.

[PROPOSED] ORDER

Pursuant to the Parties' Joint Stipulation and good cause appearing, it is HEREBY ORDERED THAT:

1. The dates from the Revised Proposed Order Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement shall be reset as follows, consistent with the Settlement Agreement:

Event	Original Date	New Date
Class Notice: Last day for the Administrator to mail the Class Notice to Class Members	November 6, 2025	14 days after receipt of the Class Data
Response Deadline: Last day for Class Members to object to the Settlement or opt out of the Settlement	December 21, 2025	45 days after mailing of Class Notice (with an additional 14 days for Class Members whose Class Notice was remailed)
Filing Deadline: Last day to file the Motion for Final Approval, Request for Attorneys' Fees and Costs, and Class Representative Service Payments to Plaintiffs	March 30, 2026	16 court days prior to the Final Approval Hearing
Final Approval Hearing	April 22, 2026, at 2:30 p.m. in Dept. 19	June 18, 2026, at _____ a.m./p.m. or the next available date and time more convenient for the Court: July 8, 2026 at 1:30 a.m./p.m., in Dept. 19 of the above-referenced Court.

1 **IT IS SO ORDERED.**

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4 Dated: March 19, 2026


HONORABLE THEODORE C. ZAYNER
JUDGE OF THE SUPERIOR COURT

PROOF OF SERVICE

Anthony Renke, et al. v. MGE Underground, Inc.
22CV403855

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I, Theresa Chan, state that I am employed in the aforesaid County, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 660 S. Figueroa St., Sky Lobby, Los Angeles, California 90017. My electronic service address is theresa.chan@wilshirelawfirm.com.

On March 17, 2026, I served the foregoing **JOINT STIPULATION AND [PROPOSED] ORDER TO CONTINUE THE HEARING ON PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT AND REVISE THE IMPLEMENTATION SCHEDULE** on the interested parties as follows:

SEE LIST OF PARTIES ATTACHED

- (X) **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the person at the email addresses listed above using One Legal.
- (X) **BY UPLOAD:** I hereby certify that the documents were uploaded by my office to the State of California Labor & Workforce Development Agency Online Filing Site.

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

Executed on March 17, 2026, at Los Angeles, California.



Theresa Chan

PROOF OF SERVICE

Anthony Renke, et al. v. MGE Underground, Inc.
22CV403855

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