

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego

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Clerk of the Superior Court
By A. Villasenor ,Deputy Clerk

1 John G. Yslas (SBN 187324)
john.yslas@wilshirelawfirm.com
2 Diego Aviles (SBN 315533)
diego.aviles@wilshirelawfirm.com
3 Harry Erganyan (SBN 333091)
harry.erganyan@wilshirelawfirm.com
4 Mariam Nazaretyan (SBN 334154)
mariam.nazaretyan@wilshirelawfirm.com
5 Emily K. Borman (SBN 303180)
emily.borman@wilshirelawfirm.com
6 Courtney M. Miller (SBN 327850)
courtney.miller@wilshirelawfirm.com
7 **WILSHIRE LAW FIRM, PLC**
8 660 S. Figueroa Street, Sky Lobby
9 Los Angeles, California 90017
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

10 Attorneys for Plaintiff

11 J. Rod Betts (SBN 098912)
rod.betts@quarles.com
12 Nora J. Steinhagen (SBN 338969)
nora.steinhagen@quarles.com
13 **QUARLES & BRADY LLP**
14 101 West Broadway, Ninth Floor
San Diego, California 92101-8285
Telephone: 619-237-5200
15 Facsimile: 619-615-0700

16 Attorneys for Defendant

17 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
18 **FOR THE COUNTY OF SAN DIEGO**
19

20 JASON SAMPSON, individually, and on behalf
21 of all others similarly situated,

22 *Plaintiff,*

23 v.

24 LETTER RIDE, LLC, a California limited
25 liability company; and DOES 1 through 10,
inclusive,

26 *Defendants.*
27
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Case No.: 37-2023-00051773-CU-OE-CTL

*[Assigned for All Purposes to the Hon.
Marcella O. McLaughlin, Dept. C-72]*

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

Action Filed: November 27, 2023

JOINT STIPULATION AND [PROPOSED] ORDER TO CONTINUE THE MOTION FOR FINAL
APPROVAL OF SETTLEMENT HEARING AND REVISE THE IMPLEMENTATION SCHEDULE

1 **STIPULATION**

2 Plaintiff Jason Sampson (“Plaintiff”), and Defendant Letter Ride LLC (“Defendant”)
3 (Plaintiffs and Defendant collectively, the “Parties”), by and through their respective counsel of
4 record, hereby stipulate as follows:

5 **WHEREAS**, on December 22, 2025, Plaintiff filed a Motion for Preliminary Approval of
6 Class Action and PAGA Settlement;

7 **WHEREAS**, on January 16, 2026, Plaintiff’s Motion for Preliminary Approval of Class
8 Action and PAGA Settlement (“MPA”) was heard by the Court and granted on the condition that
9 the Parties make specific edits to the Class Notice then submit a Revised Proposed Order with the
10 Revised Class Notice attached as an exhibit;

11 **WHEREAS**, the Parties prepared the Revised Class Notice in accordance with the Court’s
12 January 16, 2026 ruling;

13 **WHEREAS**, on January 19, 2026, the Court received Plaintiff’s Revised Proposed Order
14 with the Revised Class Notice attached as exhibit;

15 **WHEREAS**, the Court entered the Revised Order Granting Plaintiff’s MPA on March 3,
16 2026;

17 **WHEREAS**, Plaintiff provided the Revised Order Granting Plaintiff’s MPA to the
18 Administrator soon thereafter and was informed by the Administrator that there is insufficient time
19 to complete the class notice administration process in advance of the current hearing date for
20 Plaintiff’s Motion for Final Approval of Class Action and PAGA Settlement (“MFA”); and

21 **WHEREAS**, in light of this, the Parties have agreed to file a stipulation requesting that the
22 Court continue the hearing date for Plaintiff’s MFA by approximately 60 days and reset the
23 attendant due dates in accordance with the Settlement Agreement.

24 **THEREFORE, THE PARTIES STIPULATE AND AGREE AS FOLLOWS:**

25 1. The Parties agree to the MFA Hearing date being continued to July 15, 2026, and
26 the Implementation Schedule dates be reset consistent with the Settlement Agreement and the new
27 MFA Hearing date; and

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2. The Parties agree that the new MFA Hearing date and updated Implementation Schedule shall not affect or excuse Defendant from adhering to the funding timeline outlined in the Settlement Agreement.

IT IS SO STIPULATED.

Dated: March 12, 2026

WILSHIRE LAW FIRM, PLC

By: /s/ Courtney M. Miller

Courtney M. Miller
Attorneys for Plaintiff
JASON SAMPSON

Dated: March 12, 2026

QUARLES & BRADY LLP

By: /s/ Nora J. Steinhagen

Nora J. Steinhagen
Attorneys for Plaintiff
LETTER RIDE, LLC

~~[PROPOSED]~~ ORDER

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

1. The hearing date for Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement ("MFA") shall be reset from May 15, 2026, at 9:30 a.m. to July 15, 2026, at 9:30 a.m. in Dept. C-72 of the above-referenced Court.

2. The Implementation Schedule dates originally approved on March 3, 2026, shall be reset consistent with the Settlement Agreement and the new MFA Hearing date as follows:

Event	Timing
Class Data: Last day for Defendant to provide Class Data to the Administrator	10 days after the Court grants Preliminary Approval of the Settlement
Class Notice: Last day for Administrator to mail the Class Notice to Class Members	14 days after receipt of the Class Data
Response Deadline: Last day for Class Members to submit written objections, challenges to workweeks and/or pay periods, and requests for exclusion	45 days after Class Notice is mailed out by the Administrator (with an additional 14 days for Class Members whose Class Notice was remailed)
Filing Deadline: Last day to file Motion for Final Approval, Request for Attorneys' Fees and Costs, and Class Representative Service Payment to Plaintiff	16 court days before the Final Approval Hearing
Final Approval Hearing	July 15, 2026, at 9:30 a.m. in Dept. C-72 of the above-referenced Court.

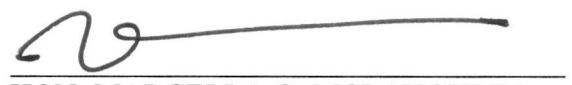
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3. The new MFA Hearing date and updated Implementation Schedule shall not affect or excuse Defendant from adhering to the funding timeline outlined in the Settlement Agreement.

IT IS SO ORDERED.

DATE: 3/28/2016



HON. MARCELLA O. MCLAUGHLIN
JUDGE OF THE SUPERIOR COURT

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

Sampson v. Letter Ride, LLC
San Diego Superior Court Case No. 37-2023-00051773-CU-OE-CTL

I am over 18 years of age and not a party to this action. My business address is 660 S. Figueroa Street, Sky Lobby, Los Angeles, California 90017. My electronic service address is evette.padilla@wilshirelawfirm.com.

On March 12, 2026, I served the following documents: **JOINT STIPULATION AND [PROPOSED] ORDER TO CONTINUE THE HEARING ON PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT AND REVISE THE IMPLEMENTATION SCHEDULE** on all interested parties as follows:

J. Rod Betts (SBN 098912)
Nora J. Steinhagen (SBN 338969)
QUARLES & BRADY LLP
101 West Broadway, Suite 1500
San Diego, California 92101-8285

Counsel for Defendant
LETTER RIDE, LLC

rod.betts@quarles.com
nora.steinhagen@quarles.com

(X) **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the person(s) at the electronic service address(es) 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 12, 2026, at Los Angeles, California.

Evette Padilla

Evette Padilla