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FILED

By Superior Court of California, County of San Mateo

ON 04/01/2026

By /s/ Nelson, Ashlee

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3/23/2026

CLERK OF THE SUPERIOR COURT
SAN MATEO COUNTY

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **COUNTY OF SAN MATEO**

16 **TRADER JOE'S WAGE AND HOUR
CASES**

17 Coordination Proceeding Special Title
18 (Cal. R. Ct. 3.550)

Case No. JCCP 5196

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO CONTINUE
DATES IN ADVANCE OF FINAL
APPROVAL HEARING**

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Attorneys for Plaintiffs
Randy Meirose and Antonio Arzate

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

2 Plaintiffs Gregory Bartlett, Cassandra Vaglienty, Carla Cobian, Randy Meirose, and
3 Antonio Arzate (“Plaintiffs”) and Defendant Trader Joe’s Company (“Trader Joe’s” and,
4 collectively with Plaintiffs, the “Parties”), by and through their respective counsel, hereby
5 stipulate and agree as follows:

6 WHEREAS, *Bartlett v. Trader Joe’s Company*, San Francisco County Superior No. CGC-
7 20-588293 (“*Bartlett P*”), *Bartlett v. Trader Joe’s Company*, San Francisco County Superior No.
8 CGC-21-589761 (“*Bartlett IP*”), and *Silicani v. Trader Joe’s Company*, San Mateo County
9 Superior No. 20CIV00668 (“*Silicani*”) were coordinated for all purposes as JCCP 5196 (the
10 “Coordinated Action”) on November 30, 2021;

11 WHEREAS, the Parties reached a settlement in the Coordinated Action, and Plaintiffs
12 filed a Motion for Preliminary Approval of the settlement on March 18, 2026, which Trader Joe’s
13 did not oppose;

14 WHEREAS, Plaintiffs filed a Proposed Order Granting Preliminary Approval (the
15 “Proposed Order”) on March 18, 2026, along with their Motion, which proposed a Final Approval
16 Hearing date of August 13, 2026, at 3:00 p.m.;

17 WHEREAS, the Proposed Order also set dates and deadlines for events leading up to the
18 Final Approval Hearing, including the deadline for Trader Joe’s to submit class and PAGA group
19 data to the settlement administrator; the Class Notice mailing date; and the deadline for Plaintiffs
20 to file their Motion for Final Approval, all based on the proposed August 13, 2026 Final Approval
21 Hearing date;

22 WHEREAS, on March 12, 2026, the Court entered the Proposed Order in full, with a
23 single change to set the Final Approval Hearing for April 23, 2027, at 3:00 p.m., due to the
24 Court’s unavailability on the proposed August 13, 2026 date;

25 WHEREAS, on March 16, 2026, the Clerk of this Court confirmed via email that the Final
26 Approval Hearing would actually be set for April 22, 2027, at 3:00 p.m., as the Court hears
27 complex cases on Thursdays;

28 WHEREAS, the Clerk also confirmed in the same email that “per Judge McCannon—

1 [d]eadlines should be adjusted according to the new date”;

2 NOW, THEREFORE, and in accordance with the Court’s instruction that deadlines be
3 adjusted in tandem with the April 22, 2027 Final Approval Hearing date, the Parties stipulate and
4 respectfully request that the following schedule be adopted:

5		
6	a. Deadline for Defendant to Submit Class and PAGA	June 26, 2026
7	Data to Settlement Administrator	
8	b. Deadline for Settlement Administrator to Mail Class	July 10, 2026
9	Notice Packets	[+14 days after Class and PAGA
10		Data provided]
11	c. Deadline for Class Members to Postmark Opt-Out	September 8, 2026
12	Statements, Workweek Disputes and Written	[+60 days after Class Notice Packet
13	Objections to the Settlement	mailed]
14	d. Deadline for Settlement Administrator to Provide	September 29, 2026
15	List of all Participating Class Members and Non-	[+21 days after deadline to submit
16	Participating Class Members	objections or Opt-Out Statements]
17	e. Deadline for Plaintiffs to file Motion for Final	March 31, 2027
18	Approval	[16 court days before Final Approval
19		Hearing]
20	f. Final Approval Hearing and Final Approval	April 22, 2027 at 3:00 p.m.
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Dated: March 23, 2026

O'MELVENY & MYERS LLP

By: /s/ Dawn Sestito
Dawn Sestito
Attorneys for Defendant
Trader Joe's Company

Dated: March 23, 2026

BLUMENTHAL NORDREHAUG
BHOWMIK DE BLOUW LLP

By: /s/ Christine T. LeVu
Christine T. LeVu
Attorneys for Plaintiffs
Gregory Bartlett, Cassandra Vaglienty, and
Carla Cobian

Dated: March 23, 2026

CAPSTONE LAW APC

By: /s/ Jonathan Lee
Jonathan Lee
Attorneys for Plaintiffs
Randy Meirose and Antonio Arzate

[PROPOSED] ORDER

The Court, having reviewed the Parties' Joint Stipulation to Continue Dates in Advance of Final Approval Hearing, and finding good cause appearing therefore, orders that the following schedule of dates and deadlines be adopted:

a. Deadline for Defendant to Submit Class and PAGA Data to Settlement Administrator	June 26, 2026
b. Deadline for Settlement Administrator to Mail Class Notice Packets	July 10, 2026 [+14 days after Class and PAGA Data provided]
c. Deadline for Class Members to Postmark Opt-Out Statements, Workweek Disputes and Written Objections to the Settlement	September 8, 2026 [+60 days after Class Notice Packet mailed]
d. Deadline for Settlement Administrator to Provide List of all Participating Class Members and Non-Participating Class Members	September 29, 2026 [+21 days after deadline to submit objections or Opt-Out Statements]
e. Deadline for Plaintiffs to file Motion for Final Approval	March 31, 2027 [16 court days before Final Approval Hearing]
f. Final Approval Hearing and Final Approval	April 22, 2027 at 3:00 p.m.

IT IS SO ORDERED.

Dated: _____, 2026

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SIGNED

By /s/McCannon, Mark
03/30/2026

Hon. Mark A. McCannon
Judge of the Superior Court
County of San Mateo, State of California

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PROOF OF SERVICE

I am over the age of eighteen years and not a party to the within action. I am a resident of or employed in the county where the service described below occurred. My business address is 610 Newport Center Drive, 17th Floor, Newport Beach, California 92660. On March 23, 2026, I served the following:

JOINT STIPULATION AND [PROPOSED] ORDER TO CONTINUE DATES IN ADVANCE OF FINAL APPROVAL HEARING

by causing the document to be emailed or electronically transmitted to the person(s) at the email addresses set out on the below service list, pursuant to a court order or an agreement of the parties to accept service by email or electronic transmission.

I declare under penalty of perjury under the laws of State of California that the above is true and correct. Executed on March 23, 2026 at Newport Beach, California.

/s/ Allison N. Bader

Allison N. Bader

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