

1 ARCH LEGAL, P.C.
Nathan J. Reese (SBN 283150)
2 nreese@archlegal.com
Samara A. Bahu (SBN 351440)
3 sbahu@archlegal.com
3555 Fifth Avenue, Suite 200
4 San Diego, California 92103
Telephone: 619.692.0800
5 Facsimile: 619.692.0822

6 Attorneys for Plaintiffs Lisa Napper and Queensly
Asemota

7 [Additional Counsel on Following Page]

8
9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF SAN DIEGO**

11 **ASSOCIATED HEALTH WAGE AND
HOUR CASES**

12 Coordinated actions:

13 **Sanchez v. Associated Health Professionals,
Inc.**

14 Superior Court of California, County of San
Diego
15 Case No. 37-2019-00035374

16 **Napper v. Associated Health Professionals,
Inc.**

17 Superior Court of California, County of Los
Angeles
18 Case No. 21STCV09332

19 **Guillory v. Associated Health Professionals,
Inc.**

20 Superior Court of California, County of San
Bernardino
21 Case No. CIVSB2210910

22 **Guillory v. Associated Health Professionals,
Inc. (PAGA)**

23 Superior Court of California, County of San
Bernardino
24 Case No. CIVSB2223523
25
26
27
28

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego
8/5/2026 4:56:41 PM

Clerk of the Superior Court
By M. Romero ,Deputy Clerk

**JUDICIAL COUNCIL COORDINATION
PROCEEDING No. JCCP 5219**

(Assigned for all purposes to Judge Blaine K.
Bowman; Dept. C-74)

**JOINT STIPULATION TO CONTINUE THE
HEARING ON PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS AND PAGA
ACTION SETTLEMENT; AND [PROPOSED]
ORDER THEREON**

[IMAGED FILE]

Dept: C-74
Judge: Hon. Blaine K. Bowman

Complaint Filed: March 8, 2021
First Amended Complaint Filed: April 9, 2024
Second Amended Complaint Filed: June 10, 2026
Trial Date: None Set

1 **AEGIS LAW FIRM, PC**

Kashif Haque (SBN 218672)

2 khaque@aegislawfirm.com

3 Samuel A. Wong (SBN 217104)

swong@aegislawfirm.com

4 Jessica L. Campbell (SBN 280626)

jcampbell@aegislawfirm.com

5 Joseph M. Szilagyi (SBN 317450)

jszilagyi@aegislawfirm.com

6 9811 Irvine Center Drive, Suite 100

7 Irvine, California 92618

Telephone: (949) 379-6250

8 Facsimile: (949) 379-6251

9 Attorneys for Plaintiff Liliana Sanchez,
10 individually and behalf of all other similarly situated,

11 **LAVI & EBRAHIMIAN, LLP**

Joseph Lavi, Esq. (SBN 209776)

12 jlavi@lelawfirm.com

Vincent C. Granberry, Esq. (SBN 276483)

13 vgranberry@lelawfirm.com

James Clark, Esq. (SBN 349799)

14 jclark@lelawfirm.com

15 8889 W. Olympic Boulevard, Suite 200

Beverly Hills, California 9021 I

16 Telephone: (310) 432-0000

Facsimile: (310) 432-0001

17 Attorneys for Plaintiff Brittani Guillory,
18 on behalf of herself and others similarly situated

19 **OGLETREE, DEAKINS, NASH, SMOAK &**
20 **STEWART, P.C.**

Tracie Childs (SBN 190806)

21 tracie.childs@ogletree.com

Andrew J. Deddeh (SBN 272638)

22 andrew.deddeh@ogletree.com

23 4660 La Jolla Village Drive, Suite 900

San Diego, CA 92122

24 Telephone: (858) 652-3100

Facsimile: (858) 652-3101

25 Attorneys for Defendant Associated Health Professionals, Inc.
26
27
28

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

3 Plaintiffs Lisa Napper, Queensly Asemota, Brittani Guillory, and Liliana Sanchez ("Plaintiffs")
4 and Defendant Associated Health Professionals, Inc. ("Defendant") (collectively "the Parties"), by and
5 through their respective counsel of record, respectfully submit this Joint Stipulation to Continue the
6 Hearing on Plaintiffs' Motion for Final Approval of Class and PAGA Action Settlement and respectfully
7 request this Court to enter an order in accordance with the following:

8 WHEREAS, on May 13, 2026, Plaintiffs filed their Unopposed Motion for: (1) preliminary
9 approval of the settlement of Plaintiffs' class claims as stated in the Class Action and PAGA Settlement
10 Agreement; (2) conditional certification of the class for settlement purposes; (3) approval and direction of
11 distribution of the Court-Approved Notice of Class Action and PAGA Settlement and Hearing Date for
12 Final Court Approval to the class members; and (4) appointment of the Class Representatives, Class
13 Counsel, and the Settlement Administrator;

14 WHEREAS, on June 5, 2026, this Court entered an Order granting Plaintiffs' Motion for
15 Preliminary Approval and set a hearing on Plaintiffs' Motion for Final Approval of Class Action and
16 PAGA Representative Action Settlement ("Plaintiffs' Motion for Final Approval") for
17 September 24, 2026, at 8:30 a.m. in Department C-74 of the above-entitled Court;

18 WHEREAS, on June 5, 2026, Plaintiffs' counsel provided the tentative ruling granting Plaintiffs'
19 Motion for Preliminary Approval to the court-approved settlement administrator, Apex Class Action, LLC
20 ("Apex"), for review and to begin preparing the necessary documentation for mailing the court-approved
21 class notice to class members;

22 WHEREAS, on June 8, 2026, Plaintiffs' counsel provided the Order granting Plaintiffs' Motion
23 for Preliminary Approval to Apex;

24 WHEREAS, Defendant transmitted the settlement class data to Apex on July 1, 2026;

25 WHEREAS, upon review of the class member data provided by Defendant's counsel, Apex
26 identified several discrepancies that needed to be resolved before the notice could be finalized; Apex
27 notified Defense counsel of these discrepancies in detail by email on July 8, 2026, and informed Class
28 Counsel of the discrepancies on July 10, 2026;

1 WHEREAS, Defense counsel provided information resolving the discrepancies by July 21, 2026;
2 WHEREAS, on July 22, 2026, Apex circulated the final Notice for counsel's review and approval,
3 requesting approval from all parties by noon on July 23, 2026;

4 WHEREAS, on July 23, 2026, Apex circulated a revised final Notice for counsel's review and
5 approval, requesting approval by close of business that day so that mailing could proceed on July 24, 2026;

6 WHEREAS, Defense counsel did not approve the mailing until July 27, 2026; as a direct result of
7 this delay, the mailing could not be completed until July 29, 2026;

8 WHEREAS, Apex confirmed that the court-approved class notice was mailed on July 29, 2026;

9 WHEREAS, because of the delay in mailing described above, the current deadline for class
10 members to submit objections to or opt out of the proposed settlement is September 25, 2026—one
11 day after the September 24, 2026 hearing on Plaintiffs' Motion for Final Approval;

12 WHEREAS, the Parties have met and conferred and agree that a brief continuance of the hearing
13 on Plaintiffs' Motion for Final Approval will ensure class members have sufficient time to submit
14 objections or opt-out requests before Plaintiffs file their Motion for Final Approval, and will conserve
15 judicial resources by avoiding the need for a separate motion to continue;

16 THEREFORE, the Parties agree and stipulate to the following:

- 17 1. The hearing on Plaintiffs' Motion for Final Approval shall be continued to October 1, 2026
18 at 8:30 a.m. or a later date convenient to the Court.
- 19 2. Plaintiffs shall file their Motion for Final Approval no later than 16 court days prior to the
20 continued hearing date.

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

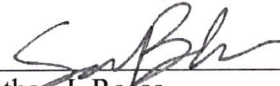
27 ///

28 ///

1 IT IS SO STIPULATED.

3 Dated: August 5, 2026

ARCH LEGAL, P.C.

4 By: 

Nathan J. Reese
Samara A. Bahu
Attorneys for Plaintiffs Lisa Napper and
Queensly Asemota

7 Dated: August 5, 2026

AEGIS LAW FIRM, PC

8 By: /s/ Joseph Szilagyi (with permission)

Kashif Haque
Samuel A. Wong
Joseph M. Szilagyi
Attorneys for Plaintiff Liliana Sanchez

11 Dated: August 5, 2026

LAVI & EBRAHIMIAN, LLP

12 By: /s/ James Clark (with permission)

Joseph Lavi
Vincent Granberry
James Clark
Attorneys for Plaintiff Brittani Guillory

15 Dated: August 5, 2026

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

17 By: /s/ Tracie Childs (with permission)

Tracie Childs
Andrew J. Deddeh
Attorneys for Defendant Associated
Health Professionals, Inc.

[PROPOSED] ORDER

After considering the Parties' Stipulation and finding good cause, IT IS HEREBY ORDERED that:

1. The hearing on Plaintiffs' Motion for Final Approval is continued to October 2, 2026 at 8:30 a.m. ~~p.m.~~ in Department C-74 of the Hall of Justice.
2. Plaintiffs' Motion for Final Approval must be filed no later than 16 court days before the above hearing date.

IT IS SO ORDERED.

Dated: 8-7-26


Hon. Blaine K. Bowman
Judge of the Superior Court