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SALAZAR, individually and as successor
in interest to RAMON DIAZ, on behalf
of themselves and others similarly
situated

[additional counsel listed on following page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

ANTHONY RIVAS, EDGAR ORTEGA,
SALVADOR CHAVEZ, MOSES OLAEZ, LUIS
HERNANDEZ VILLASENOR, and ANA
SALAZAR, individually and as successor in
interest to RAMON DIAZ, on behalf of themselves
and others similarly situated,

PLAINTIFFS,

vs.

FOREST RIVER MANUFACTURING, LLC.;
FOREST RIVER, INC.; and DOES 1 to 100,
Inclusive,

DEFENDANTS

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT

MAY 27 2026

BY 
VALERIE URUENA, DEPUTY

LEAD CASE NO. CIVDS2007953
CASE NO.: CIVDS2021683

[Assigned for All Purposes to: Hon. Kevin C. Lee,
Dept. S26]

**JOINT STIPULATION TO CONTINUE
MOTION FOR FINAL APPROVAL
HEARING AND [PROPOSED] ORDER**

Complaint Filed: March 13, 2020

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10 SALAZAR, individually and as successor in interest to
11 RAMON DIAZ, on behalf of themselves and others
12 similarly situated.

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HERNANDEZ VILLASENOR, on
behalf of himself and others
similarly situated.

1 **TO THIS HONORABLE COURT:**

2 This Joint Stipulation is made by and between Plaintiffs Anthony Rivas, Edgar Ortega,
3 Salvador Chavez, Moses Olacz, Luiz Hernandez Villasenor, and Ana Salazar (individually and as
4 successor in interest to Ramon Diaz) (together, the "Plaintiffs"), and Defendants Forest River
5 Manufacturing, LLC and Forest River, Inc. ("Defendants") (Plaintiffs and Defendants are collectively
6 referred to as the "Parties"):

7 WHEREAS, Plaintiffs' Motion for Preliminary Approval of their Class Action settlement was
8 granted on May 21, 2026 (the "MPA Approval Date");

9 WHEREAS, this Court has scheduled a hearing for Plaintiffs' Motion for Final Approval of
10 their Class Action settlement for August 3, 2026;

11 WHEREAS, per the Class Action settlement agreement and the signed order, the Parties need
12 at least 150 days to complete the notice process and to file the requisite documents needed for the
13 Motion for Final Approval hearing, and;

14 WHEREAS, in light of the aforementioned, the Parties agree that the Motion for Final
15 Approval hearing scheduled for August 3, 2026, should be continued so that the hearing is at least
16 150 days after the MPA Approval date.

17 NOW, THEREFORE, it is hereby stipulated and agreed, by and between Plaintiffs and
18 Defendant that the Motion for Final Approval hearing scheduled for August 3, 2026, be continued to
19 October 19, 2026, or to a date and time thereafter more convenient for the Court:
20 _____, 2026, at _____ a.m./p.m. in Department S26 of the above-
21 referenced Court

22 **IT IS SO STIPULATED.**

23
24 ***SIGNATURES ON NEXT PAGE***
25
26
27
28

1
2 Dated: May 22, 2026
3

LAVI & EBRAHIMIAN, LLP

4 By: /s/ Alexander J. Aroeste

Alexander J. Aroeste

5 Attorneys for PLAINTIFFS ANTHONY
6 RIVAS, EDGAR ORTEGA, SALVADOR
7 CHAVEZ, and ANA SALAZAR,
8 individually and as successor in interest to
RAMON DIAZ, on behalf of themselves and
others similarly situated

9 Dated: May 22, 2026
10

**BLUMENTHAL NORDREHAUG BHOWMIK DE
BLOUW LLP**

11 By: /s/ Kyle R. Nordehaug

Kyle R. Nordehaug

12 Attorneys for PLAINTIFF MOSES OLAEZ,
13 on behalf of himself and others similarly
14 situated

15 Dated: May 22, 2026
16

KJT LAW GROUP, LLP

17 By: /s/ Christopher A. Adams

Christopher A. Adams

18 Attorneys for PLAINTIFF LUIS
19 HERNANDEZ VILLASENOR, on behalf of
himself and others similarly situated

20
21 **FISHER & PHILLIPS LLP**

22 Dated: May 22, 2026
23

24 By: /s/ Ashton M. Riley

Ashton M. Riley, Esq.

25 Joshua D. Klein, Esq.

26 Attorneys for Defendants,
27 FOREST RIVER MANUFACTURING,
28 LLC, FOREST RIVER, INC.

1 **[PROPOSED] ORDER**

2 Based on the Stipulation of the Parties, and good causing appearing therefore, the Court hereby orders
3 as follows:

4 1. The Motion for Final Approval hearing scheduled for August 3, 2026, is continued to 8:30
5 a.m. on October 19, 2026, or to a date and time thereafter more convenient for the Court:
6 October 14, 2026, at 830 (a.m./p.m. in Department S26 of the above-referenced Court.

7 **IT IS SO ORDERED.**

8
9 Dated: MAY 27 2026


HONORABLE KEVIN C. LEE
JUDGE OF THE SUPERIOR COURT