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14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **COUNTY OF LOS ANGELES**

17 FERNANDO SALGUERO, as an aggrieved
employee and private attorney general,

18 Plaintiff,

19 vs.

20 COLLABERA, INC., a New Jersey Corporation;
21 and DOES 1 through 50, inclusive,

22 Defendants.
23

Case No.: 20STCV19946

*Assigned for all purposes to: Hon. Michael L.
Stern, Dept. 62*

**JOINT STIPULATION GRANTING
PLAINTIFF LEAVE TO FILE ELONGATED
MOTION FOR ORDER APPROVING
SETTLEMENT PURSUANT TO
CALIFORNIA LABOR CODE PRIVATE
ATTORNEYS GENERAL ACT;
[PROPOSED] ORDER THEREON**

Complaint Filed: May 26, 2020
Trial date: January 31, 2022

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**JOINT STIPULATION GRANTING PLAINTIFF LEAVE TO FILE ELONGATED MOTION FOR ORDER APPROVING
SETTLEMENT PURSUANT TO CALIFORNIA LABOR CODE PRIVATE ATTORNEYS GENERAL ACT;
[PROPOSED] ORDER THEREON**

1 **JOINT STIPULATION GRANTING LEAVE TO FILE ELONGATED MOTION**

2 WHEREAS, on May 26, 2020, Plaintiff Fernando Salguero commenced the above-captioned
3 representative action against Defendant Collabera, Inc. (“Defendant”) by filing a Complaint for
4 Damages & Enforcement Under the Private Attorneys General Act, California Labor Code section
5 2698, *et seq.* (“PAGA”);

6 WHEREAS, after exhaustive discovery and aggressive litigation, the Parties agreed to settle the
7 dispute;

8 WHEREAS, Plaintiff shall be filing a Motion for Order Approving Settlement Pursuant to
9 California Labor Code Private Attorneys General Act (hereinafter “Motion for Approval of PAGA
10 Settlement”);

11 WHEREAS, pursuant to the California Rules of Court, rule 3.1113(d), Plaintiff’s memorandum
12 may not exceed fifteen (15) pages;

13 WHEREAS, due to the history of this Action, Plaintiff’s anticipated Motion for Approval of
14 PAGA Settlement is over fifteen (15) pages;

15 WHEREAS, the Parties have conferred about and agree that subject to the Court’s approval,
16 Plaintiff’s memorandum for the Motion for Approval of PAGA Settlement may exceed fifteen (15)
17 pages in length.

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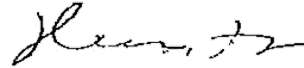
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1 THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY THE PARTIES HERETO,
2 THROUGH THEIR RESPECTIVE COUNSEL, AS FOLLOWS:

3 1. Subject to the Court's approval, Plaintiff shall be granted leave to file their Motion for
4 Approval of PAGA Settlement exceeding the fifteen (15) page limit.

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6 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

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8 Dated: October 27, 2021



Heather Davis
Amir Nayebdadash
Attorneys for Plaintiff
FERNANDO SALGUERO

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13 Dated: October 27, 2021



Rebecca Aragon
Helen Braginsky
Attorneys for Defendant
COLLABERA, INC.

1 **[PROPOSED] ORDER**

2 Pursuant to the above Joint Stipulation and good cause appearing,

3 **IT IS HEREBY ORDERED THAT:**

4 1. Plaintiff Fernando Salguero is granted leave to file an elongated Motion for Approval
5 of PAGA Settlement exceeding the fifteen (15) page limit.

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7 **IT IS SO ORDERED.**

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10 Dated: _____

11 Hon. Michael L. Stern
12 Judge of the Superior Court
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