

Exhibit 1 - Order Granting Joint Stipulation to Continue Motion for Preliminary Approval Deadline and Hearing


(SIGNATURE)

EXHIBIT 1

LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203

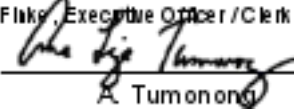
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Attorneys for Defendant

FILED
Superior Court of California
County of Alameda
10/08/2024

Clad File, Executive Officer / Clerk of the Court
By:  Deputy
A. Tumorono

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

JUSTIN CANELIAS, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

GLOBAL SYN-TURF, INC., an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendant.

Case No.: RG21090397
[Consolidated with Case No. RG21104966]

Honorable Michael Markman
Department 23

CLASS ACTION

**JOINT STIPULATION TO CONTINUE
MOTION FOR PRELIMINARY
APPROVAL DEADLINE AND
HEARING; ~~[PROPOSED]~~ ORDER
THEREON**

Class Action Filed: February 23, 2021
PAGA Action Filed: June 17, 2021

JUSTIN CANELIAS, individually, and on
behalf of aggrieved employees pursuant to the
California Private Attorney General Act;

Plaintiff,

vs.

GLOBAL SYN-TURF, INC., an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendant.

**JOINT STIPULATION TO CONTINUE MOTION FOR PRELIMINARY APPROVAL
DEADLINE AND HEARING; [PROPOSED] ORDER THEREON**

Plaintiff Justin Canelias (“Plaintiff”) and Defendant Global Syn-Turf, Inc. (“Defendant”) (together “the Parties”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, On July 1, 2024, Plaintiff filed his Motion for Preliminary Approval of Class Action and PAGA Settlement (“Motion for Preliminary Approval”) and supporting documents seeking preliminary approval of the settlement reached by the Parties. The Motion for Preliminary Approval was scheduled for hearing on August 8, 2024;

WHEREAS, on August 7, 2024, the Court issued a Tentative Ruling on the Motion for Preliminary Approval Hearing, which became the Order of the Court on August 8, 2024, wherein the Court raised certain points of inquiry regarding the settlement, continued the Motion for Preliminary Approval hearing to October 15, 2024, and set a deadline for Plaintiff to file a supplemental declaration and revised proposed order at least five (5) court days prior to the continued hearing;

WHEREAS, the Parties continue to negotiate the necessary amendments to the long-form settlement agreement and class notice in order to comply with the Court’s order;

WHEREAS, Defendant requires additional time to review Plaintiff’s revisions and produce updated class data;

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

1. The hearing on the Motion for Preliminary approval be continued to November 18, 2024 at 10:00 a.m., or another date and time that the Court deems appropriate.

2. The deadline for Plaintiff to file a supplemental declaration and revised proposed order is continued to at least five (5) court days prior to the continued hearing.

IT IS SO AGREED.

Dated: October 7, 2024

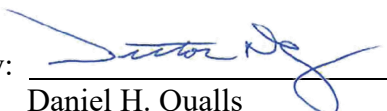
LAWYERS for JUSTICE, PC

By: Helene Mayer
Helene Mayer
Attorneys for Plaintiff

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Dated: October 7, 2024

O'HAGAN MEYER LLP

By: 
Daniel H. Qualls
Victor Ng
Attorneys for Defendant

~~PROPOSED~~ ORDER

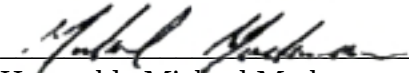
Pursuant to the above Stipulation and good cause appearing,

IT IS HEREBY ORDERED THAT:

1. The hearing on the Motion for Preliminary approval is continued to
Nov. 19, 2024 at 10am at _____ a.m./p.m.

2. The deadline for Plaintiff to file s supplemental declaration and revised proposed
order is continued to at least five (5) court days prior to the continued hearing.

Dated: 10/08/2024


Honorable Michael Markman
Judge of the Superior Court
Michael Markman / Judge

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 410 West Arden Avenue, Suite 203, Glendale, California 91203.

On October 15, 2024, I served the foregoing document(s) described as:

• **NOTICE OF ENTRY OF JUDGMENT OR ORDER**

on interested parties in this action by Electronic Service as follows:

Daniel H. Qualls

Victor C. Ng

O'HAGAN MEYER LLP

One Embarcadero Center, Suite 2100

San Francisco, California 94111

Emails: vng@ohaganmeyer.com; dqualls@ohaganmeyer.com; dmayorga@ohaganmeyer.com; vocampo@ohaganmeyer.com

Attorneys for Defendants

[X] BY E-MAIL

The above-referenced document was transmitted to the person(s) at the e-mail addresses listed herein at their most recent known e-mail address or e-mail of record in this action. I did not receive, within reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

State of California, Labor & Workforce Development Agency Web URL:

<http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

[X] BY ONLINE SUBMISSION

The foregoing documents were transmitted to the California Labor and Workforce Development Agency through the online system established for the submission of notices and documents, in conformity with California Labor Code section 2699(l). I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

[X] STATE

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 15, 2024, at Glendale, California.



Brenda Castillo