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

RAHMAD PERRY, individually, and on
behalf of other members of the general
public similarly situated and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiff,

vs.

BELLA BRU NATOMAS LLC, a
California limited liability company; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 34-2020-00281583-CU-OE-GDS

Honorable Jill H. Talley
Department 25

CLASS ACTION

**JOINT STIPULATION TO DEEM THE
FILING OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT TIMELY;
[PROPOSED] ORDER THEREON**

Complaint Filed:	July 8, 2020
FAC Filed:	February 14, 2022
Jury Trial Date:	None Set

**JOINT STIPULATION TO DEEM THE FILING OF PLAINTIFF'S MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT TIMELY; [PROPOSED] ORDER THEREON**

Plaintiff Rahmad Perry (“Plaintiff”), and Defendant Bella Bru Natomas, LLC (“Defendant”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate as follows:

WHEREAS, the Parties have reached a class-wide settlement which, if approved by the Court, will resolve the above-captioned action in its entirety;

WHEREAS, on March 23, 2022, Plaintiff’s Counsel reserved a hearing for May 31, 2022 at 1:30 p.m. in Department 25 of the above-captioned Court for the hearing on Plaintiff’s motion for preliminary approval of settlement, and based on this hearing date, the deadline to file the motion was May 6, 2022, per California Civil Procedure Code section 1005(b);

WHEREAS, on May 10, 2022, Plaintiff served and filed the Motion for Preliminary Approval of Class Action Settlement (“Motion for Preliminary Approval”) and supporting documents;

WHEREAS, Plaintiff’s Motion for Preliminary Approval is unopposed;

WHEREAS, the Parties seek an order shortening the time period for Plaintiff to file the Motion for Preliminary Approval and supporting papers, such that they are deemed timely and the currently-scheduled hearing remains on calendar.

THEREFORE, THE PARTIES HEREBY STIPULATE, AND RESPECTFULLY REQUEST AN ORDER providing as follows:

1. The time period to file the Motion for Preliminary Approval and supporting papers is shortened such that it is deemed timely filed on May 10, 2022.

2. The hearing on Plaintiff’s Motion for Preliminary Approval remains on calendar for May 31, 2022 at 1:30 p.m. in Department 25 of the above-captioned Court.

IT IS SO AGREED.

Dated: May 10, 2022

LAWYERS for JUSTICE, PC

By: 
Joanna Ghosh
Janardana Burns
Attorneys for Plaintiff

Dated: May 10, 2022

DUGGAN McHUGH LAW CORPORATION

By: 

Laura C. McHugh
Jennifer E. Duggan
Samantha J. Tanner
Attorneys for Defendant

[PROPOSED] ORDER

The Court, having reviewed the Parties' Stipulation, orders as follows:

1. The Parties' Stipulation is approved.
2. The time period to file the moving and supporting papers with respect to Plaintiff's Motion for Preliminary Approval of Class Action Settlement is shortened such that they are deemed timely filed on May 10, 2022.
3. The hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement remains on calendar for May 31, 2022 at 1:30 p.m. in Department 25 of the above-captioned Court.

IT IS SO ORDERED.

Dated: _____

Honorable Jill H. Talley
Judge of the Superior Court