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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

ROBERT MACIAS, on behalf of himself and all others similarly situated, Plaintiff, v. LEFIELL MANUFACTURING CO., a California Corporation; and DOES 1-50, inclusive, Defendant.	Case No. 25STCV04710 (Related to Case Nos.: 25STCV06644 and 25STCV13876) Honorable Theresa M. Traber Department 1 **JOINT STIPULATION TO CONSOLIDATE CASE NOS. 25STCV04710, 25STCV06644, AND 25STCV13876; [PROPOSED] ORDER** Complaint Filed: February 20, 2025 Trial Date: Not Set

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LEFIELL MANUFACTURING CO.

TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

Plaintiffs Robert Macias ("Plaintiff Macias") and Walter Redd ("Plaintiff Redd") (together, "Plaintiffs") and Defendant LeFiell Manufacturing Co. ("Defendant") (collectively, with Plaintiffs, the "Parties"), by and through their counsel of record, hereby stipulate as follows:

WHEREAS, on February 20, 2025, Plaintiff Macias filed a Class Action Complaint in the action entitled *Robert Macias v. LeFiell Manufacturing Co.*, Los Angeles County Superior Court Case No. 25STCV04710 ("Macias Action"), thereby commencing a putative class action against Defendant;

WHEREAS, on March 7, 2025, Plaintiff Redd filed a Class Action Complaint in the action entitled *Walter Redd v. LeFiell Manufacturing Co.*, Los Angeles County Superior Court Case No. 25STCV06644 ("Redd Class Action"), thereby commencing a putative class action against Defendant;

WHEREAS, on May 12, 2025, Plaintiff Redd filed a Complaint for Enforcement Action Under the Private Attorneys General Act, Cal. Labor Code §§ 2698 *Et Seq.* in the action entitled *Walter Redd v. LeFiell Manufacturing Co.*, Los Angeles County Superior Court Case No. 25STCV13876 ("Redd PAGA Action"), which alleged one cause of action under the Private Attorneys General Act of 2004 pursuant to California Labor Code Section 2698 *et seq.* ("PAGA") against Defendant;

WHEREAS, on June 3, 2025, the Court ordered the Redd Class Action, the Redd PAGA Action, and the Macias Action related, and deemed the Macias Action the lead case;

WHEREAS, the Parties have reached a settlement of the Macias Action, Redd Class Action, and Redd PAGA Action (collectively, "Actions"), which, if approved by the Court, will resolve the Actions in their entirety;

WHEREAS, in order to effectuate and facilitate the settlement approval process, and to conserve the Court's and the Parties' resources during the settlement process, the Parties seek to consolidate the Actions;

NOW, THEREFORE, the Parties, through their respective attorneys of record, **HEREBY STIPULATE AND REQUEST** as follows:

For purposes of settlement approval, the actions entitled *Robert Macias v. LeFiell Manufacturing Co.*, Los Angeles County Superior Court Case No. 25STCV04710, *Walter Redd v. LeFiell Manufacturing Co.*, Los Angeles County Superior Court Case No. 25STCV06644, and *Walter*

Redd v. LeFiell Manufacturing Co., Los Angeles County Superior Court Case No. 25STCV13876 are hereby consolidated and Case No. 25STCV04710 is designated as the lead case.

Dated: November 6, 2026

BLACKSTONE LAW, APC

/s/ Jasmine Y. Kianfard
Alexandra Rose
Jasmine Y. Kianfard
Attorneys for Plaintiff WALTER REDD and the putative class

Dated: November 6, 2026

BOKHOUR LAW GROUP, P.C.

/s/ Mehrdad Bokhour
Mehrdad Bokhour, Esq.
Attorneys for Plaintiff ROBERT MACIAS and the putative class

Dated: November 6, 2026

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

Hardy R. Murphy, Esq.
Kyle A. Wende, Esq.
Attorneys for Defendant LEFIELL MANUFACTURING CO.

[PROPOSED] ORDER

The Court, having reviewed the Parties' Joint Stipulation to consolidate Case Nos. 25STCV04710, 25STCV06644, AND 25STCV13876 and FOR GOOD CAUSE appearing, hereby GRANTS the Parties' request and ORDERS the following:

For purposes of settlement approval, the actions entitled *Robert Macias v. LeFiell Manufacturing Co.*, Los Angeles County Superior Court Case No. 25STCV04710, *Walter Redd v. LeFiell Manufacturing Co.*, Los Angeles County Superior Court Case No. 25STCV06644, and *Walter Redd v. LeFiell Manufacturing Co.*, Los Angeles County Superior Court Case No. 25STCV13876 are hereby consolidated and Case No. 25STCV04710 is designated as the lead case.

IT IS SO ORDERED.

Dated: _____, 2026

_____
The Honorable Theresa M. Traber
Judge of the Superior Court