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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF KINGS**

13 JOHNNY RIVAS, individually and on behalf of
14 others similarly situated and on behalf of other
aggrieved employees,

15 Plaintiff,

16 vs.

17 BUCKINGHAM PROPERTY MANAGEMENT,
18 a California corporation; and DOES 1 through 25,
19 inclusive,

20 Defendants.

Case No. 23CU0355

*Assigned to the Honorable Robert S. Burns,
Department 2*

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

Complaint Filed:	September 15, 2023
FAC Filed:	October 30, 2023
SAC Filed:	June 11, 2025
Trial Date:	Not Set

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6 *Attorneys for Defendant Buckingham Property Management*

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

2 Plaintiff Johnny Rivas (“Plaintiff”) and Defendant Buckingham Property Management
3 (“Defendant,” together with Plaintiff, the “Parties”), by and through their counsel of record, hereby
4 stipulate as follows:

5 **WHEREAS**, on October 14, 2025, Plaintiff filed a Motion for Preliminary Approval of Class
6 Action and PAGA Settlement (“Motion for Preliminary Approval”) and supporting documents;

7 **WHEREAS**, on November 5, 2025, the Court heard and granted Plaintiff’s Motion for
8 Preliminary Approval;

9 **WHEREAS**, on November 6, 2025, Plaintiff filed a [Revised Proposed] Order Granting
10 Preliminary Approval of Class Action and PAGA Settlement;

11 **WHEREAS**, as of the date of this filing, the Parties have not yet received the Court’s signed
12 Order granting preliminary approval, which, as a result, has prevented the settlement administration
13 process from commencing, the Notice of Class Action Settlement (“Class Notice”) has not been mailed
14 to the Class Members, and the hearing date on Plaintiff’s Motion for Final Approval of Class Action
15 and PAGA Settlement (“Motion for Final Approval”) along with the deadline to file are no longer
16 feasible;

17 **WHEREAS**, the Parties seek an order continuing the deadline for the Settlement
18 Administrator to mail the Class Notice to Class Members, continuing the deadline to file the Motion
19 for Final Approval, and continuing the hearing on Plaintiff’s Motion for Final Approval;

20 **WHEREAS**, concurrently with this filing, the Parties have submitted a [Further Revised
21 Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement.

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

24 1. The deadline for the Settlement Administrator to mail the Class Notice to the Class
25 Members be continued to five (5) business days after the Court enters the Order granting this Joint
26 Stipulation to Continue Motion for Final Approval Hearing and Filing Deadline;

27 ///

28 ///

2. The hearing on Plaintiff's Motion for Final Approval be continued from February 23, 2026 at 8:15 a.m. to the end of April 2026, or as close thereafter as is convenient for the Court; and

3. The deadline for Plaintiff to file the Motion for Final Approval be continued to sixteen (16) court days prior to the continued hearing date.

IT IS SO STIPULATED.

Dated: January 13, 2026

BLACKSTONE LAW, APC

By: /s/ Alexandra Rose
Miriam L. Schimmel
Joana Fang
Alexandra Rose
Jared C. Osborne
Attorneys for Plaintiff

Dated: January 13, 2026

**GORDON REES SCULLY MANSUKHANI,
LLP**

By: /s/ Sat Sang S. Khalsa
Mollie M. Burks
Sat Sang S. Khalsa
Landon Sciacca
Attorneys for Defendant

[PROPOSED] ORDER

The Court, having considered the foregoing Joint Stipulation to Continue Motion for Final Approval Hearing and Filing Deadline, and for good cause appearing, hereby GRANTS the Parties' requests and ORDERS the following:

1. The Settlement Administrator shall mail the Class Notice by First Class U.S. mail to all Class Members within five (5) business days of this Order;

2. The hearing on Plaintiff's Motion for Final Approval is continued to _____ at _____ in Department 1 of the above-captioned Court; and

3. The deadline to file the Motion for Final Approval is continued to sixteen (16) court days prior to the continued hearing date.

IT IS SO ORDERED.

Dated: _____

Honorable Robert S. Burns
Judge of the Superior Court