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Superior Court of California,
County of San Diego

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Clerk of the Superior Court
By A. Villasenor, Deputy Clerk

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Attorneys for Defendant

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

CLARA WHITE, individually, and on behalf of
aggrieved employees pursuant to the Private
Attorneys General Act ("PAGA");

Plaintiff,

v.

JEFFREY PINE HOLDINGS, LLC DBA
VILLA LAS PALMAS HEALTHCARE
CENTER, a California limited liability company;
and DOES 1 through 100, inclusive;

Defendants.

Case No.: 37-2023-00050597-CU-OE-CTL

Assigned for All Purposes to:
Honorable Marcella O. McLaughlin
Department C-72

**JOINT STIPULATION AND
~~[PROPOSED]~~ ORDER TO LIFT STAY
AND TO GRANT REQUEST FOR
DISMISSAL**

Complaint Filed: November 20, 2023
Trial Date: None Set

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

3 Plaintiff Clara White (“Plaintiff”) and Defendant Jeffrey Pine Holdings, LLC dba Villa Las
4 Palmas Healthcare Center (“Defendant”) (collectively, the “Parties”), by and through their
5 respective counsel of record, hereby stipulate as follows:

6 WHEREAS, on November 20, 2023, Plaintiff filed the representative Private Attorneys
7 General Act of 2004 (“PAGA”) action against Defendant in the Superior Court of California,
8 County of San Diego (Case No. 37-2023-00050597-CU-OE-CTL);

9 WHEREAS, after engaging in discovery, investigations, and negotiations, on August 13,
10 2024, the Parties attended mediation with mediator Jeff Winikow;

11 WHEREAS, while the Parties did not initially settle at mediation, continued negotiations
12 eventually resulted in a settlement on a PAGA-only basis;

13 WHEREAS, on April 22, 2025, the Parties entered into a Settlement Agreement;

14 WHEREAS, on October 10, 2025, the Court granted the PAGA Approval Motion;

15 WHEREAS, on April 28, 2026, the Court informed the Parties that there was a stay placed
16 on this lawsuit and instructed the Parties to stipulate to lift the stay and to request the dismissal of
17 this lawsuit;

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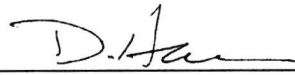
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1 IT IS HEREBY STIPULATED by the undersigned Parties that the stay placed on this
2 lawsuit should be lifted and that the Request for Dismissal requesting for the dismissal of the
3 lawsuit that has been filed concurrently herewith should be granted.

4
5 Dated: May 12, 2026

JUSTICE LAW CORPORATION

6 By: 
7 Douglas Han
8 Christopher Petersen
9 *Attorneys for Plaintiff*

10 Dated: May 12, 2026

FISHER & PHILLIPS LLP

11 By: /s/ Grace Y. Horoupian
12 Grace Y. Horoupian
13 *Attorneys for Defendant*
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[PROPOSED] ORDER

Pursuant to the above Stipulation and good cause appearing, IT IS HEREBY ORDERED that: (1) the stay placed on this lawsuit is lifted; and (2) the Request for Dismissal requesting for the dismissal of the lawsuit that has been filed concurrently herewith is granted.

Dismissal shall be with prejudice.

IT IS SO ORDERED.

Dated: May 15, 2016


Honorable Marcella O. McLaughlin
Judge of the Superior Court