

ELECTRONICALLY FILED
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;

18 ///

19 ///

20 ///

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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1 **[PROPOSED] ORDER**

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

5 *Dismissal shall be with prejudice.*
6 **IT IS SO ORDERED.**

7 Dated: May 15, 2016

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9 Honorable Marcella O. McLaughlin
10 Judge of the Superior Court
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PROOF OF SERVICE
1013A(3) CCP

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 751 N. Fair Oaks Ave., Ste. 101 Pasadena, California 91103. My electronic service address is dmather@justicelawcorp.com

On June 3, 2026, I served the foregoing document described as

JOINT STIPULATION AND ORDER TO LIFT STAY AND TO GRANT REQUEST FOR DISMISSAL

for the following case: **White v. Jeffrey Pine Holdings, LLC dba Villa Las Palmas Healthcare Center**
LWDA/Court Case No.: **LWDA Case No.: LWDA-CM-981171-23**
Court Case No.: 37-2023-00050597-CU-OE-CTL
San Diego County Superior Court

on interested parties in this action by electronically submitting as follows:

State of California
Labor & Workforce Development Agency
800 Capitol Mall, MIC-55
Sacramento, California 95814

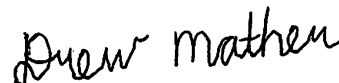
[X] BY ELECTRONIC SUBMISSION

Pursuant to California Senate Bill No. 836, I caused the documents described above to be electronically submitted by and through the procedure stated on the website of the State of California Labor and Workforce Development Agency.

[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 June 3, 2026, at Pasadena, California.



Drew Mather