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9 individually and on behalf of all others similarly situated

10 *[Additional counsel listed on next page]*

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF LOS ANGELES

13 Coordination Proceeding Special Title (CRC 3.550)

14 T.J. MAXX WAGE AND HOUR CASES

15 Included Actions:

16 *Lortkipanidize v. T.J. Maxx of CA, LLC, et al.,* Los
17 Angeles County Superior Court Case No.
19STCV43210

18 *Rucker v. T.J. Maxx of CA, LLC, et al.,* Sonoma
19 County Superior Court Case No. SCV-264483

20 *Karine Gragyan v. T.J. Maxx of CA, LLC, et al.,*
Alameda County Superior Court Case No.
21 RG20068810

22 *Karine Gragyan v. T.J. Maxx of CA, LLC, et al.,*
Los Angeles County Superior Court Case No.
23 20STCV38799

FILED
Superior Court of California
County of Los Angeles
07/15/2022
Sherri R. Carter, Executive Officer / Clerk of Court
By: D. Wortham Deputy

JCCP Case No. 5097
Assigned to Hon. Elihu M. Berle
Department SSC-6

**STIPULATION AND ~~(PROPOSED)~~
ORDER RE SETTLEMENT
ADMINISTRATION DATES AND
DEADLINES AND
ADMINISTRATOR'S FEE**

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13 Attorneys for Plaintiff
KARINE GRAGYAN

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1 The following Stipulation is entered into between Plaintiffs Michael Lortkipanidze, Robert
2 C. Rucker and Karine Gragyan (“Plaintiffs”) and Defendants T.J. Maxx of CA, LLC and T.J. Maxx
3 of CA, LLC (“Defendants”), through their respective counsel of record (collectively referred to as
4 the “Parties”).

5 WHEREAS, on June 3, 2022, the Court granted preliminary approval of the parties’
6 settlement;

7 WHEREAS, the Court’s preliminary approval order specified the following dates and
8 deadlines: Class Data due June 17, 2022; Notice mailing July 1, 2022; Final approval motion due
9 August 1, 2022; class response deadline September 1, 2022; distribution declaration and responses to
10 objections due September 19, 2022; Final fairness hearing October 3, 2022 at 9:00 a.m.;

11 WHEREAS, due to the large number of PAGA Employees, and the distinction between work
12 weeks when the employees were employed and work weeks when the employees actually worked
13 for Defendants (based on a significant gaps during Covid), Defendant has not yet completed its final
14 calculation of employee work weeks;

15 WHEREAS, due to post-COVID rehiring, the number of PAGA Employees has increased
16 resulting in an increased from about 24,000 to about 30,000. In addition, due to a miscommunication
17 with the settlement administrator, the settlement administrator’s initial bid was based upon about
18 16,000 PAGA Employees. These two factors have resulted in an increase in the settlement
19 administrator’s bid from \$45,000 to \$89,000;

20 NOW THEREFORE, in order to permit Defendant sufficient time to complete its work week
21 count, for the parties to amend the class notice and or stipulation (if necessary), and to accommodate
22 the settlement administrator’s increased fee, IT IS STIPULATED by and between the Parties hereto,
23 through their undersigned attorneys of record that:

- 24 1. The Court continue the settlement dates and deadlines as follows: Class Data due July
25 30, 2022; Notice mailing August 15, 2022; Final approval motion due September 15,
26 2022; class response deadline October 17, 2022; distribution declaration and responses to
27 objections due October 31, 2022; Final fairness hearing [TBD] at [TBD].

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2. The Court preliminarily approves the increased Settlement Administration fee of \$89,000.

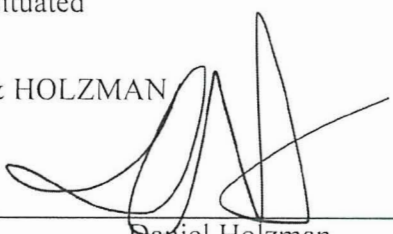
DATED: July __, 2022

GUNDZIK GUNDZIK HEEGER LLP

By: _____
Rebecca Gundzik
Attorneys for Plaintiff Michael Lortkipanidze,
individually and on behalf of all others similarly
situated

DATED: July 12, 2022

CASKEY & HOLZMAN

By:  _____
Daniel Holzman
Attorneys for Plaintiff Michael Lortkipanidze,
individually and on behalf of all others similarly
situated

DATED: July __, 2022

HAFFNER LAW, PC

By: _____
Joshua H. Haffner
Vahan Mikayelyan
Attorneys for Plaintiff Robert Rucker

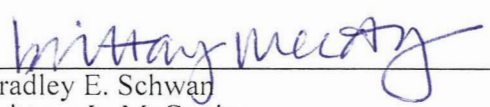
DATED: July __, 2022

LAVI & EBRAHIMIAN, LLP

By: _____
Joseph Lavi
Vincent C. Granberry
Attorneys for Plaintiff Karine Gragyan

DATED: July 13, 2022

LITTLER MENDELSON, P.C.

By:  _____
Bradley E. Schwarz
Brittany L. McCarthy
Attorneys for Defendants T.J. Maxx of CA, LLC, a
Virginia limited liability company and T.J. Maxx of
CA, LLC, a Delaware limited liability company

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2. The Court preliminarily approves the increased Settlement Administration fee of \$89,000.

DATED: July __, 2022

GUNDZIK GUNDZIK HEEGER LLP

By: _____
Rebecca Gundzik
Attorneys for Plaintiff Michael Lortkipanidze,
individually and on behalf of all others similarly
situated

DATED: July __, 2022

CASKEY & HOLZMAN

By: _____
Daniel Holzman
Attorneys for Plaintiff Michael Lortkipanidze,
individually and on behalf of all others similarly
situated

DATED: July __, 2022

HAFFNER LAW, PC

By: _____
Joshua H. Haffner
Vahan Mikayelyan
Attorneys for Plaintiff Robert Rucker

DATED: July 12, 2022

LAVI & EBRAHIMIAN, LLP

By: Courtney M. Miller
Joseph Lavi Courtney M. Miller
Vincent C. Granberry
Attorneys for Plaintiff Karine Gragyan

DATED: July __, 2022

LITTLER MENDELSON, P.C.

By: _____
Bradley E. Schwan
Brittany L. McCarthy
Attorneys for Defendants T.J. Maxx of CA, LLC, a
Virginia limited liability company and T.J. Maxx of
CA, LLC, a Delaware limited liability company

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2. The Court preliminarily approves the increased Settlement Administration fee of \$89,000.

DATED: July 12, 2022

GUNDZIK GUNDZIK HEEGER LLP



By: _____
Rebecca Gundzik
Attorneys for Plaintiff Michael Lortkipanidze,
individually and on behalf of all others similarly
situated

DATED: July __, 2022

CASKEY & HOLZMAN

By: _____
Daniel Holzman
Attorneys for Plaintiff Michael Lortkipanidze,
individually and on behalf of all others similarly
situated

DATED: July 12, 2022

HAFFNER LAW, PC



By: _____
Joshua H. Haffner
Vahan Mikayelyan
Attorneys for Plaintiff Robert Rucker

DATED: July __, 2022

LAVI & EBRAHIMIAN, LLP

By: _____
Joseph Lavi
Vincent C. Granberry
Attorneys for Plaintiff Karine Gragyan

DATED: July __, 2022

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Bradley E. Schwan
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Virginia limited liability company and T.J. Maxx of
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ORDER

Good cause appearing, the forgoing Stipulation is SO ORDERED.

1. The Court's June 3, 2022, preliminary approval order is modified as follows:

| Event | New Date |
|---|---------------------------------------|
| Deadline for Defendants to provide Class data to settlement administrator | July 30, 2022 |
| Deadline to mail Notice of Settlement to Class Members | August 15, 2022 |
| Deadline to file motion for final approval of the settlement and award of attorneys' fees and costs | September 15, 2022 |
| Deadline to dispute workdays, opt out of or object to settlement | October 17, 2022 |
| Deadline to file any class member objections and the parties' responses thereto | October 31, 2022 |
| Deadline to file settlement administrator's Declaration of Compliance and report regarding notice and exclusion process | October 31, 2022 |
| Hearing on motion for final approval of the settlement, granting of final approval, and entry of judgment | FFPI DC AN KC A E _____ |

2. Paragraph 3(c) of the order is modified to provide that the parties propose that settlement administration costs of \$89,000 will be deducted from gross settlement amount.



Elihu M. Berle

Dated: 07/15/2022

Elihu M. Berle / Judge
Hon. Elihu M. Berle

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PROOF OF SERVICE

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 eighteen (18) and not a party to the within action. My business address is 14011 Ventura Blvd., Suite 206E, Sherman Oaks, CA 91423.

On July 13, 2022, I served the following document described as

- **STIPULATION AND [PROPOSED] ORDER RE SETTLEMENT ADMINISTRATION DATES AND DEADLINES AND ADMINISTRATOR’S FEE**

on the interested parties in this action:

(X) by serving () the original (X) true copies thereof as follows:

Please see attached service list

| | |
|--|--|
| <p>() BY MAIL I caused such envelope to be deposited in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid. I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.</p> | <p>() BY FACSIMILE TRANSMISSION I caused said document(s) to be transmitted by facsimile transmission to the name(s) and facsimile telephone number(s) of the person(s) named on the attached service list. The facsimile machine telephone number of the sending facsimile machine was (818)918-2316. A transmission report was issued by the sending facsimile machine confirming that the transmission was completed without error. A true and correct copy of said transmission report is attached hereto.</p> |
| <p>() BY OVERNIGHT DELIVERY Said document was placed in an envelope designated by the express service center and placed for collection in a box regularly maintained by said carrier with whom we have a direct billing account, to be delivered to the office of the addressee listed above on the next business day.</p> | <p>(XX) BY ELECTRONIC TRANSMISSION I caused the above-described document to be electronically served to the names and email addresses listed on the Service List attached hereto.</p> |

(X) STATE I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

() FEDERAL I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

(X) EXECUTED on July 13, 2022, at Sherman Oaks, California.

Nicole Salazar

Electronic Service List

Case: **T.J. Maxx Wage and Hour Cases**
Case Info: **JCCP 5097, Los Angeles Superior Court**

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