

1 Jared L. Palmer, CA Bar No. 287974  
jared.palmer@ogletree.com  
 2 Carolyn B. Hall, CA Bar No. 212311  
carolyn.hall@ogletree.com  
 3 Jenny J. Liao, CA Bar No. 337719  
jenny.liao@ogletree.com  
 4 **OGLETREE, DEAKINS, NASH, SMOAK &  
 STEWART, P.C.**  
 5 One Embarcadero Center, Suite 900  
 San Francisco, CA 94111  
 6 Telephone: 415-442-4810  
 Facsimile: 415-442-4870  
 7

8 Attorneys for Defendant  
 PRATT (LATHROP CORRUGATING), LLC

9 John G. Yslas (SBN 187324)  
jyslas@wilshirelawfirm.com  
 10 Eugene Zinovyev (SBN 267245)  
ezinovyev@wilshirelawfirm.com  
 11 John Brown (SBN 233605)  
jbrown@wilshirelawfirm.com  
 12 Gabriella Solé (SBN 346164)  
gabriella.sole@wilshirelawfirm.com  
 13 **WILSHIRE LAW FIRM**  
 14 3055 Wilshire Blvd., 12th Floor  
 Los Angeles, California 90010  
 15 Telephone: (213) 381-9988  
 16 Facsimile: (213) 381-9989

17 Attorneys for Plaintiff  
 RIGOBERTO VILLA

18 **UNITED STATES DISTRICT COURT**  
 19 **EASTERN DISTRICT OF CALIFORNIA**  
 20

21 RIGOBERTO VILLA, individually, and on  
 22 behalf of all others similarly situated,  
 23 Plaintiff,  
 24 v.  
 25 PRATT (LATHROP CORRUGATING),  
 LLC, a Delaware limited liability company;  
 26 and DOES 1 through 10, inclusive,  
 27 Defendants.

Case No. 2:24-CV-01008-DJC-CSK  
**JOINT STIPULATION AND ORDER  
 GRANTING JOINT MOTION TO EXTEND  
 TIME TO FILE DISPOSITIONAL  
 DOCUMENTS PURSUANT TO LOCAL  
 RULE 160(b)**  
 Action Filed: April 3, 2024  
 Trial Date: None Set  
 Judge: Hon. Daniel J. Calabretta

1 This Stipulation is made and entered by and between the parties to the above-entitled action,  
2 Plaintiff Rigoberto Villa (“Plaintiff”) and Defendant Pratt (Lathrop Corrugating), LLC  
3 (“Defendant”) (collectively, the “Parties”), by and through their respective counsel, with reference  
4 to the following facts:

5 WHEREAS, on October 28, 2024, Parties filed submitted an Amended Notice of Settlement  
6 requesting that the court allow parties to file a Request for Dismissal within 30 to 45 days;

7 WHEREAS, on October 29, 2024, a Minute Order was issued mandating that Parties file  
8 Dispositional Documents within 45 days or on Thursday, December 12, 2024, pursuant to E.D. Cal.  
9 L.R. 160;

10 WHEREAS, on April 8, 2024, the Parties filed a Stipulation to Extend Time For Defendant  
11 to Respond to Initial Complaint By Not More Than 28 Days (L.R. 144);

12 WHEREAS on December 12, 2024, the Parties filed a Joint Stipulation and [Proposed] Order  
13 Granting Joint Motion to Extend Time to File Dispositional Documents Pursuant to Local Rule  
14 160(b), which was granted by the Court on December 13, 2024;

15 WHEREAS on February 10, 2025, the Parties filed a Joint Stipulation and [Proposed] Order  
16 Granting Joint Motion to Extend Time to File Dispositional Documents Pursuant to Local Rule  
17 160(b), which was granted by the Court on February 11, 2025;

18 WHEREAS, the Parties have drafted the necessary terms of the agreement, but require some  
19 additional time to execute the agreement and complete payment, and;

20 WHEREAS, the Parties continue to work toward executing the agreement and completing  
21 payment, and thus hereby request, subject to the Court’s approval, to extend the deadline to file  
22 dispositional documents by 30 days;

23 THEREFORE, good cause exists for the extension as the Parties, through their respective  
24 counsel, are working toward a settlement agreement that will resolve this matter and have been  
25 working diligently toward finalizing the settlement agreement.

26 IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, and subject to  
27 the Court's approval, that the deadline to file dispositional documents is extended by 30 days or April  
28 7, 2025.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**IT IS SO STIPULATED.**

DATED: March 10, 2025

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

By: /s/ Jared L. Palmer

Jared L. Palmer  
Carolyn B. Hall  
Jenny J. Liao

Attorneys for Defendant  
PRATT (LATHROP CORRUGATING),  
LLC

DATED: March 10, 2025

**WILSHIRE LAW FIRM**

By: /s/ John Brown

John G. Yslas  
Eugene Zinovyev  
John Brown

Attorneys for Plaintiff  
RIGOBERTO VILLA

The filer attests that the signatory listed above concurs in the content of this document and  
has authorized its filing.

/s/ John Brown

John Brown

