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8 Attorneys for Plaintiffs
 9 NAOMI FARFAN, LOLLIE WEBSTER and
 10 TERRI RICHTER

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Attorneys for Defendants
 SSC CARMICHAEL OPERATING
 COMPANY LP; SSC CARMICHAEL
 OPERATING GP, LLC; SSC CARMICHAEL
 MANAGEMENT COMPANY LP; SSC
 HICKORY 13TH OPERATING COMPANY
 LLC; SSC HICKORY EAST OPERATING
 COMPANY LLC; SAVASENIORCARE
 ADMINISTRATIVE SERVICES, LLC;
 SAVASENIORCARE, LLC;
 SAVASENIORCARE CONSULTING, LLC

11
 12 **UNITED STATES DISTRICT COURT**
 13 **NORTHERN DISTRICT OF CALIFORNIA**

14 NAOMI FARFAN, LOLLIE WEBSTER, and
 15 TERRI RICHTER, individually and on behalf of
 other members of the general public similarly
 situated,

16 Plaintiffs,

17 v.

18 SSC CARMICHAEL OPERATING COMPANY
 19 LP; SSC CARMICHAEL OPERATING GP, LLC;
 SSC CARMICHAEL MANAGEMENT
 20 COMPANY LP; SSC HICKORY 13TH
 OPERATING COMPANY LLC; SSC HICKORY
 21 EAST OPERATING COMPANY LLC;
 SAVASENIORCARE ADMINISTRATIVE
 22 SERVICES, LLC; SAVASENIORCARE, LLC;
 SAVASENIORCARE CONSULTING, LLC,

23 Defendants.

Case No. 4:18-CV-01472-HSG

**STIPULATION AND REQUEST TO
 REMAND ACTION TO MARIN COUNTY
 SUPERIOR COURT AND JOINT
 STATUS REPORT ; ORDER**

1 Plaintiffs NAOMI FARFAN, LOLLIE WEBSTER, and TERRI RICHTER (“Plaintiffs”) and
2 Defendants SSC CARMICHAEL OPERATING COMPANY LP; SSC CARMICHAEL
3 OPERATING GP, LLC; SSC CARMICHAEL MANAGEMENT COMPANY LP; SSC HICKORY
4 13TH OPERATING COMPANY LLC; SSC HICKORY EAST OPERATING COMPANY LLC;
5 SAVASENIORCARE ADMINISTRATIVE SERVICES, LLC; SAVASENIORCARE, LLC;
6 SAVASENIORCARE CONSULTING, LLC (“Defendants”) (together, the “Parties”), by and
7 through their counsel of record agree and stipulate as follows:

8 WHEREAS, on March 7, 2018 Plaintiffs filed the instant action against Defendants alleging
9 various wage claims. (Dkt. 1.) On May 1, 2018, Plaintiffs filed a first amended complaint adding an
10 allegation under the Private Attorneys General Act of 2004, Labor Code § 2698, et seq. (“PAGA”)
11 (Dkt. 12.);

12 WHEREAS, on July 9, 2018, Defendant SAVASENIORCARE, LLC filed a motion to
13 dismiss for lack of personal jurisdiction (Dkt. 20) and a motion to compel the arbitration of the
14 individual claims of Plaintiff TERRI RICHTER, and to dismiss or stay other claims pending
15 arbitration (Dkt. 22), Defendants filed a motion to compel arbitration of the individual claims of
16 plaintiffs NAOMI FARFAN and LOLLIE WEBSTER and to stay other claims pending arbitration
17 (Dkt. 25), Defendants SSC HICKORY 13TH OPERATING COMPANY, LLC and HICKORY EAST
18 OPERATING COMPANY, LLC filed a motion to dismiss for lack of personal jurisdiction (Dkt. 28),
19 and a motion to transfer venue (Dkt. 31) (collectively, the “Motions”);

20 WHEREAS, on July 27, 2018, the Court granted the Parties’ stipulation to stay the case
21 pending resolution of Defendants’ motions to compel arbitration (Dkt. 38);

22 WHEREAS, on February 1, 2019, the Court granted Defendants’ motions to compel
23 arbitration (Dkt. 50);

24 WHEREAS, on October 7, 2019, after motions for reconsideration were filed by both Parties,
25 the Court granted Defendants’ motion for reconsideration and dismissed Plaintiffs’ class claims. In
26 the order, the Court directed the Parties to provide a status report within 90 days (Dkt. 67);

27 WHEREAS, on October 31, 2019, the Court granted the Parties’ request to provide a status
28 report after the Parties’ mediation on January 22, 2020 (Dkt. 69);

1 WHEREAS, on February 21, 2020, the Parties reported that they participated in a mediation
2 on January 22, 2020, and were not able to reach resolution that day, but were continuing to discuss
3 a possible resolution and requested a continuance of the joint report date (Dkt. 70);

4 WHEREAS, on February 25, 2020, the Court granted the request (Dkt. 72);

5 WHEREAS, pursuant to the Court's requirement for a joint status report on the lawsuit, the
6 Parties report that on March 26, 2020, the parties entered into a fully executed Memorandum of
7 Agreement setting forth the terms and conditions of a global settlement of all claims in this litigation
8 (the "MOA");

9 WHEREAS, pursuant to the terms of the MOA, the Parties have agreed to request this Court
10 to remand the lawsuit to the Superior Court of California in Marin County.

11 **STIPULATION**

12 The Parties hereby stipulate to request the Court to remand this lawsuit to the Marin County
13 Superior Court.

14 DATED: March 26, 2020

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

17 By: /s/ Michael J. Nader
18 Michael J. Nader
19 Attorneys for Defendants
20 SSC CARMICHAEL OPERATING
21 COMPANY LP; SSC CARMICHAEL
22 OPERATING GP, LLC; SSC CARMICHAEL
23 MANAGEMENT COMPANY LP; SSC
24 HICKORY 13TH OPERATING COMPANY
25 LLC; SSC HICKORY EAST OPERATING
26 COMPANY LLC; SAVASENIORCARE
27 ADMINISTRATIVE SERVICES, LLC;
28 SAVASENIORCARE, LLC;
SAVASENIORCARE CONSULTING, LLC

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DATED: March 26, 2020

WYNNE LAW FIRM
THE MCCORMACK LAW FIRM

By: /s/ Edward J. Wynne
Edward J. Wynne
Bryan J. McCormack
Attorneys for Plaintiffs
NAOMI FARFAN, LOLLIE WEBSTER AND
TERRI RICHTER

SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatories.

DATED: March 26, 2020

WYNNE LAW FIRM

By: /s/ Edward J. Wynne
Edward J. Wynne
Attorneys for Plaintiffs
NAOMI FARFAN, LOLLIE WEBSTER AND
TERRI RICHTER


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PROPOSED ORDER REMANDING CASE TO MARIN COUNTY SUPERIOR COURT

The above stipulation is hereby approved. For good cause, the Court orders that this matter be remanded to the Marin County Superior Court.

IT IS SO ORDERED.

DATED: 3/27/2020


The Hon. Haywood S. Gilliam, Jr.
U.S. District Court Judge