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7 Attorneys for Plaintiffs Brandon Gay and Israel Berber

8 *[Defendant's Counsel Listed Below]*

9 **UNITED STATES DISTRICT COURT**

10 **NORTHERN DISTRICT OF CALIFORNIA**

11 BRANDON GAY, individually, and on  
behalf of the general public similarly  
12 situated; ISRAEL BERBER, individually,  
and on behalf of other aggrieved  
13 employees similarly situated;

14 Plaintiff,

15 vs.

16 PACIFIC STEEL GROUP, an unknown  
business entity; and DOES 1 through 100,  
17 inclusive,

18 Defendants.

Case No. 4:20-cv-08442-HSG

Honorable Haywood S. Gilliam, Jr.  
Courtroom 2

**CLASS ACTION**

**JOINT STIPULATION TO STAY  
AND ADMINISTRATIVELY CLOSE  
ACTIONS; ORDER**

Complaint Filed: September 22, 2020  
FAC: November 25, 2020  
Jury Trial Date: November 18, 2024

19 ISRAEL BERBER, individually, and on  
behalf of other aggrieved employees  
20 pursuant to the California Private  
Attorneys General Act;

21 Plaintiff,

22 vs.

23 PACIFIC STEEL GROUP, an unknown  
business entity; and DOES 1 through 100,  
24 inclusive,

25 Defendants.

Case No. 4:21-cv-03446-HSG

Honorable Haywood S. Gilliam, Jr.  
Courtroom 2

Complaint Filed: February 2, 2021  
Jury Trial Date: November 18, 2024

CASE NOS. 4:20-CV-08442-HSG AND 4:21-CV-03446-HSG

**JOINT STIPULATION TO STAY AND ADMINISTRATIVELY CLOSE  
ACTIONS; ORDER**

1 Lindsay Christine David (SBN 283267)  
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5 Los Angeles, CA 90067  
6 Telephone: 310.556.1801  
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8 *Attorneys for Defendant*  
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1 **TO THE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE**  
2 **NORTHERN DISTRICT OF CALIFORNIA:**

3 Plaintiffs Brandon Gay and Israel Berber (collectively, “Plaintiffs”) and  
4 Defendant Pacific Steel (“Defendant”) (collectively with Plaintiffs as “Parties”) by  
5 and through their counsel of records hereby stipulate as follows:

6 **WHEREAS**, the Parties have reached a global settlement in the above  
7 entitled actions, together with the related actions entitled *Daniela Garibay v. Pacific*  
8 *Steel Group*, San Bernardino Superior Court Case No. CIVDS2011129 (“*Garibay*  
9 *Action*”) and *Darren Morris v. Pacific Steel Group*, San Diego County Superior  
10 Court Case No. 27-2020-00021541-CU-OE-CTL (“*Morris Action*”), that once  
11 approved, will resolve the actions in their entirety;

12 **WHEREAS**, the Parties have agreed to consolidate all of the claims into the  
13 first-filed *Garibay Action* for the sole purpose of seeking approval of the global  
14 settlement within the *Garibay Action*;

15 **IT IS HEREBY STIPULATED** between the Parties, by and through their  
16 respective attorneys of record, subject to an order of the Court, that the above-  
17 entitled actions be stayed and administratively closed pending resolution of the  
18 motions for preliminary and final approval of the global settlement agreement  
19 within the *Garibay Action*.

20  
21 Dated: August 27, 2024

Respectfully submitted,  
**LAWYERS for JUSTICE, PC**

22  
23 By: /s/Arman Marukyan  
Arman Marukyan  
Attorneys for Plaintiffs

24  
25 Dated: August 27, 2024

**POLSINELLI LLP**

26  
27 By: /s/Lindsay Christine David  
Lindsay Christine David  
Attorneys for Defendant

**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-4.3.4(a)(2), the filer attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing’s content and have authorized the filing.

Respectfully submitted,

Dated: August 27, 2024

**LAWYERS for JUSTICE, PC**

By: /s/Arman Marukyan  
Arman Marukyan  
*Attorneys for Plaintiffs*

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**ORDER**


Pursuant to the above Joint Stipulation and good cause appearing,

**IT IS HEREBY ORDERED THAT:**

1. The *Gay* and *Berber* actions are hereby stayed and administratively closed pending resolution of the motions for preliminary and final approval of the global settlement agreement within the *Garibay* Action;
2. All future dates and deadlines in the *Gay* and *Berber* actions are hereby VACATED.

**IT IS SO ORDERED.**

Dated: 8/28/2024

By:   
HON. HAYWOOD S. GILLIAM, JR.  
United States District Judge