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Attorneys for Defendant
BANK OF HOPE, a California corporation

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

SHERI RAE SCHUMACHER, and BASEL
HADDAD, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

BANK OF HOPE, a California corporation,
and Does 1 to 10, inclusive,

Defendant.

FILED
Superior Court of California
County of Los Angeles
11/21/2022
Sherri R. Carter, Executive Officer / Clerk of Court
By: A. Morales Deputy

No. 18STCV02066

*Assigned for all purposes to
Hon. Amy D. Hogue
Complex Litigation Department*

**JOINT STIPULATION AND [PROPOSED]
ORDER MODIFYING SCHEDULE OF CLASS
ACTION SETTLEMENT ADMINISTRATION**

Dept: 7
Judge: Hon. Lawrence P. Riff

Action Filed: October 16, 2018

1 Plaintiff Basel Haddad and Defendant Bank of Hope (together, the “Parties”), by and
2 through their counsel, hereby stipulate as follows:

3 WHEREAS, the Parties entered a class action settlement agreement (the “Settlement”);

4 WHEREAS, on October 19, 2022, the Court entered an order preliminarily approving the
5 Settlement and directing the Parties to execute the notice regime set out in the Settlement;

6 WHEREAS, the Settlement contemplated that notice would be sent to the class a set time
7 after a preliminary approval order was entered, which date fell on November 18, 2022 (the
8 “Notice Date”);

9 WHEREAS, the Settlement contemplated other deadlines that would follow from this
10 Notice Date;

11 WHEREAS, the settlement administrator identified certain missing data in the class
12 contact information provided to it;

13 WHEREAS, the Parties have worked to identify and update this data;

14 WHEREAS, the settlement administrator now needs additional time to execute the notice
15 regime contemplated by the Settlement using this updated data;

16 WHEREAS, the Parties seek an extension of the case schedule to accommodate this
17 development, but do not seek to move the hearing on final approval of the Settlement, currently
18 set for April 12, 2023, and do not seek to change the time between the Notice Date and the
19 Claims Deadline, Objection Deadline, or Opt-Out Deadline;

20 NOW THEREFORE, the Parties stipulate that the schedule contemplated by the
21 Settlement agreement shall be modified as follows:

22

Event	Original Date	New Date
Notice Date	Within 30 Days of Preliminary Approval	December 9, 2023
Settlement Website Date	No later than 30 Days after Preliminary Approval	December 9, 2023
Claims Deadline	90 Days from Preliminary Approval	60 Days from Notice Date (February 7, 2023)

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1	Objection Deadline	90 Days from Preliminary Approval	60 Days from Notice Date (February 7, 2023)
2			
3	Opt-Out Deadline	90 Days from Preliminary Approval	60 Days from Notice Date (February 7, 2023)
4			
5			

6 All dates set by reference to the above dates and deadlines are reset pursuant to the new
7 dates and deadlines. All other dates and deadlines contemplated in the Settlement Agreement are
8 to remain the same.

9 **IT IS SO STIPULATED.**

10 Dated: November 17, 2022

COOLEY LLP

11
12 By: /s/ Max A. Bernstein
13 Max A. Bernstein (305722)

14 Attorneys for Defendant
15 BANK OF HOPE

16 Dated: November 17, 2022

WILSHIRE LAW FIRM

17
18 By: /s/ Thiago M. Coelho
19 Thiago M. Coelho (324715)

20 Attorneys for Plaintiffs and the Proposed Class

21
22 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**



23 *Lawrence P. Riff*

24 Dated: 11/21/2022

25 By: Lawrence P. Riff / Judge
26 The Honorable Lawrence P. Riff

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