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17 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
18 **FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

19 DEREK PLOUGH and MICKAEL M. GARCIA,
20 individually and on behalf of all similarly situated
former employees,

21 Plaintiffs,

22 v.

23 SHE BALL PRODUCTIONS, LLC; NCREDIBLE
PRODUCTIONS, INC. a.k.a. NCREDIBLE
24 ENTERTAINMENT; WORLDWIDE ONE MEDIA,
LLC dba ONE MEDIA WORLDWIDE; NICK
25 CANNON; DEMETRIUS V. SPENCER; BENJAMIN
SUMPTER III; MICHAEL GOLDMAN; ROBERT
26 KEETCH; ROGER UBINA; GINA SCHEERER a.k.a.
GINA MACDONALD and DOES 1 through 10,
27 inclusive,

28 Defendants.

FILED
Superior Court of California
County of Los Angeles
04/11/2023

David W. Slayton, Executive Officer / Clerk of Court
By: T. Lewis Deputy

Case No. BC696517

Case Assigned for All Purposes to
Judge David S. Cunningham

**JOINT STIPULATION TO CONTINUE
FINAL APPROVAL HEARING;
~~PROPOSED~~ ORDER**

Department 11

Action Filed: March 5, 2018
Trial Date: None Set

1 Plaintiff Mickael M. Garcia, individually and on behalf of all similarly situated former
2 employees (collectively “Plaintiffs”), and Defendants She Ball Productions, LLC (“She Ball”);
3 Ncredible Productions, Inc. a.k.a. Ncredible Entertainment (“Ncredible”); Worldwide One Media, LLC
4 d/b/a One Media Worldwide (“Worldwide One Media”); Nick Cannon; Demetrius V. Spencer;
5 Benjamin F. Sumpter III; Michael Goldman; Robert Keetch; Roger Ubina; Gina Scheerer a.k.a. Gina
6 MacDonald; and Does 1 through 10, inclusive (collectively “Defendants”), by and through their
7 respective counsel, hereby stipulate and agree as follows:

8 1. WHEREAS, the Court ordered the class notice to be mailed by March 6, 2023;

9 2. WHEREAS, the Parties gave final approval of the form of class notices to the class
10 administrator on March 3, 2023;

11 3. WHEREAS, the mailing date was scheduled for March 6, 2023;

12 4. WHEREAS, the class administrator subsequently informed the Parties that the notices were
13 not mailed until March 13, 2023, one week following the March 6, 2023 scheduled mailing date;

14 5. WHEREAS, due to the delay in the administrator’s mailing of the notices, the deadline for
15 a class member whose notice is re-mailed will not pass until after the final approval hearing, which is
16 currently set for May 5, 2023;

17 6. WHEREAS, the Parties have agreed to continue the final approval hearing for two weeks
18 in order to ensure that all class members will have an opportunity to object or opt-out;

19 7. The Parties now stipulate and agree to the following:

20 The final approval hearing on the class action shall be continued for 14 days to May 19, 2023, or
21 a date thereafter available to the Court. A notice of the updated hearing date shall be posted on the class
22 action settlement web site.

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Dated: April 10, 2023

**GILBERT & SACKMAN,
A Law Corporation**

By: /s/ Joshua F. Young
Joshua F. Young
Attorneys for Plaintiffs

Dated: April 10, 2023

**SHEPPARD, MULLIN, RICHTER & HAMPTON
LLP**

By: /s/ Ian A. Michalak
Richard J. Simmons
Jason W. Kearnaghan
Melissa M. Smith
Ian A. Michalak
Attorneys for Defendants

PROPOSED ORDER

Having read and considered the Parties' Stipulation to Continue Final Approval Hearing and good cause appearing therefor, the Court approves the stipulation and orders as follows:

1. The Final Approval Hearing shall be continued to R | ÁÉÉGH at JKEÁÈ È
a.m. / p.m.
2. The class action administrator shall post this order to the class action web site.

IT IS SO ORDERED.

DATED: 04/11/2023



HON. DAVID S. CUNNINGHAM
SUPERIOR COURT JUDGE

PROOF OF SERVICE

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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 years and not a party to the within action; my business address is 3699 Wilshire Boulevard, Suite 1200, Los Angeles, California 90010.

On April 10, 2023, I served the following document(s) described as **JOINT STIPULATION TO CONTINUE FINAL APPROVAL HEARING; [PROPOSED] ORDER** on the interested parties in this action addressed as follows:

Richard J. Simmons, Esq. (rsimmons@sheppardmullin.com)
Jason Kearnaghan, Esq. (jkearnaghan@sheppardmullin.com)
Melissa M. Smith, Esq. (melissasmith@sheppardmullin.com)
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BY CASE ANYWHERE: A true and correct copy of the document(s) was electronically served on the interested parties by transmission to Case Anywhere (www.caseanywhere.com).

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

Executed on April 10, 2023, at Los Angeles, California.



Darcy G. Laparra