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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

JUAN ALCAZAR, individually and
on behalf of all others similarly
situated,

Plaintiffs,

vs.

FASHION NOVA, INC., a California
corporation; and DOES 1 to 10,
inclusive,

Defendants.

Case No.: 4:20-cv-01434-JST

**JOINT STIPULATION AND
[PROPOSED] ORDER EXTENDING
DEADLINES IN THE ORDER
GRANTING PRELIMINARY
APPROVAL OF PROPOSED
AMENDED SETTLEMENT
[ECF No. 203]**

Plaintiff Juan Alcazar (“Plaintiff”) and Defendant Fashion Nova, Inc. (“Defendant”) (collectively, the “Parties”), by and through their respective counsel of record, jointly stipulate to and request the entry of an order for a short 30-day extension of the deadlines set in the Order Granting Plaintiff’s Motion for Preliminary Approval of Proposed Amended Settlement (“Order”) [ECF No. 203].

Whereas, the Court entered the Order on May 14, 2025, and set the following deadlines:

Event	Deadline
Class Action Fairness Notice	May 23, 2025
Deadline to commence mailing notice to organizations for the visually impaired and implementation of digital notice program	May 21, 2025
Deadline to commence posting notice of the proposed settlement on the Settlement Website	May 21, 2025
Motion for attorney’s fees, costs, and incentive awards due	July 22, 2025
Deadline to object to settlement, attorney’s fees request, or incentive awards	September 19, 2025
Deadline for California Class Members to file a claim	September 19, 2025
Motion for final approval (including responses to objections) due	October 23, 2025
Final Approval Hearing	January 8, 2026

Whereas, Plaintiff promptly sent the order to the settlement administrator on the same day it was entered (May 14, 2025);

Whereas, the Order’s deadline for the settlement administrator to commence mailing and posting notices is May 21, 2025;

1 *Whereas*, the settlement administrator reported to the Parties that it could not
 2 assemble and distribute the notices by the May 21, 2025 deadline and require at
 3 least 30 days after receiving the Court's Order to execute the tasks necessary;

4 *Whereas*, the parties met and conferred to extend all deadlines by 30 days to
 5 accommodate the settlement administrator to execute the necessary tasks.

6
 7 **IT IS HEREBY STIPULATED** that the Parties jointly request the entry of
 8 an order extending the deadlines set in the Order Granting Plaintiff's Motion for
 9 Preliminary Approval of Proposed Amended Settlement [ECF No. 203] as follows:

Event	Deadline
Class Action Fairness Notice	June 23, 2025
Deadline to commence mailing notice to organizations for the visually impaired and implementation of digital notice program	June 20, 2025
Deadline to commence posting notice of the proposed settlement on the Settlement Website	June 20, 2025
Motion for attorney's fees, costs, and incentive awards due	August 21, 2025
Deadline to object to settlement, attorney's fees request, or incentive awards	October 20, 2025
Deadline for California Class Members to file a claim	October 20, 2025
Motion for final approval (including responses to objections) due	December 12, 2025
Final Approval Hearing	Thursday, February 12, 2026 @ 2:00 p.m. or at the Court's Convenience

IT IS SO STIPULATED.

Dated: May 16, 2025

Respectfully submitted,

By: /s/ Thiago M. Coelho

Thiago M. Coelho

Jennifer Leinbach

WILSHIRE LAW FIRM, PLC

Attorneys for Plaintiff Juan Alcazar

and the Nationwide and California

Classes

Dated: May 16, 2025

Respectfully submitted,

By: /s/ Amy P. Lally

Amy P. Lally

Eric B. Schwartz

Anna Tutundjian

Marissa X. Hernández

SIDLEY AUSTIN LLP

Attorneys for Defendant

Fashion Nova, Inc.

ATTESTATION OF CONCURRENCE OF FILING

In accord with the Northern District of California's Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from each of the other signatories who are listed on the signature page(s).

/s/ Thiago M. Coelho
Thiago M. Coelho

[PROPOSED] ORDER

Having reviewed the parties' stipulation and good cause appearing therefore, it is hereby ordered that the deadlines set in the Order Granting Plaintiff's Motion for Preliminary Approval of Proposed Amended Settlement [ECF No. 203] are extended and modified as follows:

Event	Deadline
Class Action Fairness Notice	June 23, 2025
Deadline to commence mailing notice to organizations for the visually impaired and implementation of digital notice program	June 20, 2025
Deadline to commence posting notice of the proposed settlement on the Settlement Website	June 20, 2025
Motion for attorney's fees, costs, and incentive awards due	August 21, 2025
Deadline to object to settlement, attorney's fees request, or incentive awards	October 20, 2025
Deadline for California Class Members to file a claim	October 20, 2025
Motion for final approval (including responses to objections) due	December 12, 2025
Final Approval Hearing	Thursday, February 12, 2026 @ 2:00 p.m. or _____

IT IS SO ORDERED.

Date: _____

Hon. Jon S. Tigar
United States District Court Judge