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FILED
Superior Court of California
County of Los Angeles
OCT 20 2018
SHERRI R. CARTER EXECUTIVE OFFICER/CLERK
BY *[Signature]* Deputy
MARIBEL M...

Attorneys for Plaintiff, ANTHONY W. FORD
on behalf of himself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

ANTHONY W. FORD on behalf of himself and
all others similarly situated

Plaintiff,

vs.

DOUGLAS EMMETT MANAGEMENT, LLC.
a Delaware limited liability company, and
DOES 1 through 50, inclusive,

Defendants: **RECEIVED**
LOS ANGELES SUPERIOR COURT

OCT 17 2018

I. LOVO

Case No. BC705955

ASSIGNED FOR ALL PURPOSES TO:
JUDGE: HON. John Shepard Wiley, Jr.
DEPT: 9

**STIPULATION TO REQUEST TO
CONTINUE CASE MANAGEMENT
CONFERENCE; [~~PROPOSED~~] ORDER**

Date: October 19, 2018
Time: 2:00 p.m.
Dept.: 9

Plaintiff ANTHONY W. FORD (hereinafter referred to as "Plaintiff") and Defendant
DOUGLAS EMMETT MANAGEMENT, LLC. (hereinafter referred to as "DOUGLAS
EMMETT" and/or "Defendant") hereby submit this Stipulation to Continue Case Management
Conference in the above- referenced matter. This Stipulation is based on the following:

1. This is a Class Action, pursuant to Code of Civil Procedure section 382, filed by
Plaintiff on May 10, 2018 alleging the following claims against Defendants: 1) Failure to pay all
lawful wages owed including overtime wages; 2) failure to provide compliant meal periods; 3)

1 failure to authorize and permit lawful rest breaks; 4) failure to reimburse employee expenses; 5)
2 failure to timely pay wages; 6) failure to provide accurate itemized wage statements and 7)
3 Unfair Competition. Plaintiff seeks to represent a class of current and former non-exempt
4 employees who were employed by DOUGLAS EMMETT in California.

5 2. Counsel for Defendant provided Plaintiff's counsel with an arbitration agreement
6 that Mr. Ford signed while employed by Defendant and which contains a class action waiver and
7 subjects Plaintiff to arbitration of his individual claims exclusively.

8 3.. In light of Morris v Ernst & Young, LLP, 834 F. 3d 975 (9th Cir. 2016)
9 ("Morris"), in which the U.S. Supreme Court ruled that class action waivers in arbitration
10 agreements are enforceable, Plaintiff has no other option but to dismiss the class action claims
11 and pursue his individual claims in arbitration.

12 4. Plaintiff is in the process of filing a request for dismissal of class action and
13 individual claims against Defendant without prejudice.

14 5. In light of foregoing and in order not to waste the Court's time, the Parties
15 respectfully request that the status conference scheduled for October 19, 2018 be continued to
16 December 20, 2018 or any date thereafter at the Court's convenience.

17 Respectfully submitted,

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19 **Dated: October 16, 2018**

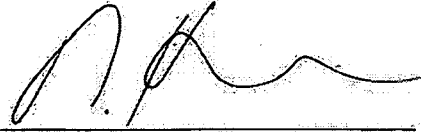
JAMES HAWKINS, APLC

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22 Isandra Y. Fernandez, Esq.
23 Attorneys for Plaintiff
24 Anthony W. Ford
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1 Dated: October 16, 2018

MULLEN & HENZEL L.L.P.

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5 Nathan E. Klouda
6 Attorneys for Defendant
7 Douglas Emmett Management, LLC

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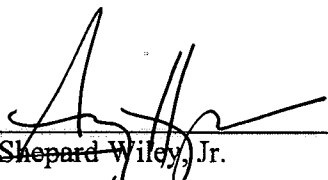
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~~PROPOSED~~ ORDER

Pursuant to the Stipulation made herein and good cause appearing therefore, it is ordered that the Status Conference currently set for October 19, 2018 is continued to

12/20/18 10:00 am

Dated: October 18, 2018



Hon. John Shepard Wiley, Jr.
Amy Hogue

