

1 Jahan C. Sagafi (SBN 224887)  
jsagafi@outtengolden.com  
2 Moira Heiges-Goepfert (SBN 326861)  
mhg@outtengolden.com  
3 Kaelyn Mahar (SBN 338257)  
kmahar@outtengolden.com  
4 OUTTEN & GOLDEN LLP  
5 One California Street, 12th Floor  
San Francisco, CA 94111  
6 Telephone: (415) 638-8800  
7 Facsimile: (415) 638-8810

8 Steven Elster (SBN 227545)  
steve.elster.law@gmail.com  
9 LAW OFFICE OF STEVEN ELSTER  
785/E2 Oak Grove Road, No. 201  
10 Concord, CA 94518  
11 Telephone: (925) 324-2159  
*Attorneys for Plaintiffs and proposed*  
12 *Class Members*

CATHERINE A. CONWAY, SBN 98366  
cconway@gibsondunn.com  
JESSE A. CRIPPS, SBN 222285  
jcripps@gibsondunn.com  
MEGAN M. LAWSON, SBN 294397  
mlawson@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, CA 90071-3197  
Telephone: 213.229.7000  
Facsimile: 213.229.7520  
Attorneys for Defendant CHEVRON U.S.A. INC.

Mollie Burks (SBN: 222112)  
mburks@grsm.com  
Sat Sang S. Khalsa (SBN: 256130)  
skhalsa@grsm.com  
GORDON REES SCULLY MANSUKHANI, LLP  
275 Battery Street, Suite 2000  
San Francisco, CA 94111  
Telephone: (510) 463-8668  
Facsimile: (415) 986-8054  
*Attorneys for Defendant NEWTRON LLC*

*Additional counsel listed on signature page*

16 **UNITED STATES DISTRICT COURT**  
17 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

18 SHAWN CLAYBORNE, an individual, on behalf  
of himself, all others similarly situated,  
19 and all other aggrieved employees; DAVID  
POOL, an individual, on behalf of himself  
20 and all others similarly situated,

21 PLAINTIFFS,

22 vs.

23 CHEVRON U.S.A. INC., NEWTRON LLC,  
PERFORMANCE MECHANICAL, INC.,  
24 SPECIALTY WELDING AND  
TURNAROUNDS, LLC, and DOES 1-100,  
25 Inclusive,

26 DEFENDANTS.

Case No. 4:19-cv-07624-JSW

**JOINT STIPULATION & ~~PROPOSED~~**  
**ORDER TO ADVANCE FINAL**  
**APPROVAL HEARING DATE**

Action Filed: November 14, 2019  
Action Removed: November 19, 2019

1 Plaintiff Shawn Clayborne, individually and on behalf of all others similarly situated and all  
 2 other aggrieved employees (“Plaintiffs”), and Defendants Chevron U.S.A. Inc. (“Chevron”) and  
 3 Newtron LLC (“Newtron”) hereby stipulate and respectfully request that the Court advance the date of  
 4 the hearing on Plaintiffs’ forthcoming motion for final approval of the Stipulation of Settlement and  
 5 Release from July 28, 2023 to June 30, 2023.

6 WHEREAS, Plaintiffs filed a Notice of Motion and Motion for Preliminary Approval of Class  
 7 Action and PAGA Settlement on January 27, 2023;

8 WHEREAS, the Court granted Plaintiffs’ Motion for Preliminary Approval of Class Action and  
 9 PAGA Settlement on February 22, 2023;

10 WHEREAS, the Court set the hearing for Plaintiffs’ forthcoming motion for final approval for  
 11 July 28, 2023, consistent with Plaintiffs’ request in their briefing;

12 WHEREAS, because the Court granted preliminary approval earlier than anticipated in the  
 13 schedule submitted by Plaintiffs, the parties are able to begin settlement implementation ahead of that  
 14 schedule, so the parties respectfully request that the Court change the final approval hearing date from  
 15 July 28, 2023 to June 30, 2023;

16 WHEREAS, with that change, the various settlement implementation steps will occur on the  
 17 following schedule:

Event	Proposed Date
Entry of Preliminary Approval Order	February 22, 2023
Defendants to provide class list data to Administrator	March 24, 2023
Notice disseminated by Administrator	April 7, 2023
Motion for Attorneys’ Fees, Costs, and Service Award	April 17, 2023
Final Approval Motion	May 19, 2023
Deadline for exclusions and objections	May 22, 2023
Plaintiff’s Reply to Final Approval Motion	June 16, 2023
Final Approval Hearing	June 30, 2023

18  
 19  
 20  
 21  
 22  
 23  
 24 WHEREAS, Plaintiffs will file a Final Approval Motion on May 19, 2023, before the end of the  
 25 exclusion and objection period, and file a reply to that motion updating the Court, on or before June 16,  
 26 2023, with regard to any requests for exclusion or objections received after May 19, 2023;

