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(Formerly known as Organic Pastures
8 Dairy Company, LLC)

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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF ORANGE – CIVIL COMPLEX CENTER

12 Mark Nilchian, Individually and on behalf of
13 all others similarly situated,
14 Plaintiff,
15 v.
16 Organic Pastures Dairy Company LLC,
17 Defendant.

CASE NO. 30-2020-01166856-CU-MC-CXC
**JOINT STIPULATION AND
[PROPOSED] ORDER TO ALTER
PAYMENT SCHEDULE AND
CONTINUE THE FINAL
ACCOUNTING HEARING**
ASSIGNED FOR ALL PURPOSES TO:
HONORABLE DAVID A. HOFFER
DEPARTMENT CX103

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19 Defendant Raw Farm, LLC (formerly known as Organic Pastures Dairy Company, LLC)
20 (“Defendant”) and Plaintiff Mark Nilchian (“Plaintiff” and collectively, the “Parties”) hereby
21 stipulate and seek the Court’s approval to alter the payment schedule and continue the Final
22 Accounting Hearing to September 14, 2026.

23 WHEREAS, the Final Accounting Hearing is currently scheduled for April 27, 2026;

24 WHEREAS, the Parties agree that the current hearing date does not allow sufficient time
25 after the Effective Date of December 1, 2025, for the 30-days attributed to distributing payments
26 to the Settlement Class, plus the 120 days provided for the Settlement Class to cash the settlement
27 checks, plus the 60 days attributed for the Settlement Administrator to distribute voided uncashed
28 checks to the Cy Pres recipient, and plus the time needed to timely prepare and file final

1 accounting reports with the Court in advance of the hearing;

2 WHEREAS, Defendant has made substantial payments towards the settlement sum, but
3 due to unexpected financial hurdles and business obligations, and to avoid notable disruption to
4 Defendant's business, Defendant requires a short extension of time to make complete payment
5 of the settlement amount. Defendant anticipates payment to be complete by end of March 2026;

6 WHEREAS, given there are sufficient funds in the QSF account to distribute payment to
7 the entirety of the Settlement Class, including to Plaintiff as representative of the class, the
8 Parties and their counsel agree to distribute payment to the Settlement Class and the Class
9 Representative, Mark Nilchian, immediately while the remainder of the settlement payment is
10 completed; as such, there is little to no prejudice to the class or the Class Representative;
11 similarly, Plaintiff's counsel is in agreement with the class and Class Representative being paid
12 first;

13 WHEREAS, the Parties stipulate to alter the payment schedule so that the remainder of
14 the payments are due by March 31, 2026, and to continue the Final Approval Hearing to
15 September 14, 2026 to allow for a brief extension for Defendant to complete payment of the
16 settlement amount, for the 120 days the Settlement Class has to cash the settlement checks, the
17 60 days the Settlement Administrator has to distribute the remaining funds to the Cy Pres
18 recipient, and the time needed to prepare and submit an accounting report in advance of the Final
19 Accounting Hearing.

20 For the foregoing reasons, the Parties submit this joint stipulation and proposed order, and
21 respectfully request the Court continue the Final Accounting Hearing to September 14, 2026.

22 **[SIGNATURES ON FOLLOWING PAGE]**

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Date: January 23, 2026

KAZEROUNI LAW GROUP, APC

By: /s/ Ryan McBride
Abbas Kazerounian, Esq.
Nicholas R. Barthel, Esq.
Ryan McBride, Esq.
Attorneys for Plaintiff Mark Nilchian

Date: January 23, 2026

STRUCTURE LAW GROUP, LLP

By: /s/ Karen Rothschild
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Karen F. Rothschild, Esq.
Attorneys for Defendant Raw Farm, LLC
(Formerly known as Organic Pastures
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[PROPOSED] ORDER

The Court, having reviewed the above stipulation of the Parties, orders that the Parties' Joint Stipulation to Alter Payment Schedule and Continue the Final Accounting Hearing is GRANTED as follows:

1. Remaining payment due by March 31, 2026.
2. The Final Accounting Hearing is hereby continued to September 14, 2026.

IT IS SO ORDERED.

Date: _____

By: _____
Hon. David A. Hoffer
Judge of the Superior Court