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7 Attorneys for Defendant
COUNTY OF LOS ANGELES, erroneously
8 named as LOS ANGELES COUNTY
PROBATION DEPARTMENT
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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

13 RAUL GUTIERREZ, JASON HERRERA,
DANIEL PARRA, PAUL PERKINS, and
14 JEFFREY ZENTNER, individuals, on behalf
of themselves and all others similarly situated,

15 Plaintiffs,

16 v.

17 LOS ANGELES COUNTY PROBATION
18 DEPARTMENT, a division of the County of
Los Angeles; and DOES 1 through 100,

19 Defendants.
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21 AND ALL RELATED CASES.
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[Exempt From Filing Fee
Government Code § 6103]

FILED
Superior Court of California
County of Los Angeles
02/10/2026
David W. Slayton, Executive Officer / Clerk of Court
By: P. Herrera Deputy

CASE NO. 24STCV06193 (Lead)
[And All Related Cases]

**JOINT STIPULATION RE: REVISED
SCHEDULE FOR DEPOSITIONS OF
PROPOSED CLASS REPRESENTATIVES
AND CLASS CERTIFICATION
BRIEFING; ~~PROPOSED~~ ORDER**

Assigned for All Purposes to:
Hon. Elihu M. Berle, Dept. SS-6

Action Filed: March 12, 2024
Trial Date: None Set

1 By and through their respective counsel of record, Plaintiffs in *Gutierrez, et al. v. Los*
2 *Angeles County Probation Department*, Case No. 24STCV06193, and in *Franklin, et al. v. Los*
3 *Angeles County Probation Department*, Case No. 24STCV20182 (collectively, the “Proposed
4 Class Representatives”), and Defendant County of Los Angeles (the “County”) (together with
5 Plaintiffs, the “Parties”) hereby stipulate and agree as follows:

6 **WHEREAS**, on December 30, 2025, pursuant to a prior Joint Stipulation filed by the
7 Parties, the Court entered an Order setting forth the following schedule for depositions of the
8 Proposed Class Representatives, briefing of the Proposed Class Representatives’ Motion for Class
9 Certification, and a hearing on the Proposed Class Representatives’ Motion for Class Certification:

- 10 1. **December 31, 2025:** Deadline for the Proposed Class Representatives to file their
11 Motion for Class Certification;
- 12 2. **January 31, 2026:** Deadline for all ten Proposed Class Representatives to attend
13 their depositions;
- 14 3. **February 26, 2026:** Deadline for the County to file an Opposition to the Motion
15 for Class Certification;
- 16 4. **March 12, 2026:** Deadline for the Proposed Class Representatives to file a Reply
17 in support of their Motion for Class Certification;
- 18 5. **April 15, 2026 at 11:00 a.m.:** Hearing on the Motion for Class Certification;¹

19 **WHEREAS**, the Proposed Class Representatives did not file or serve their Motion for
20 Class Certification until January 12, 2026;

21 **WHEREAS**, counsel for the Proposed Class Representatives recently informed the
22 County’s counsel that not all Proposed Class Representatives would be made available for
23 depositions by January 31, 2026, but that all Proposed Class Representatives would be made
24 available for depositions by February 13, 2026;

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27 ¹ The prior Joint Stipulation proposed “March 19, 2026 at 11:00 a.m. (or as soon thereafter as is
28 convenient to the Court)” for the hearing on the Motion for Class Certification. The Court
selected April 15, 2026 at 11:00 a.m. for the hearing.

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DATED: February 3, 2026

JOSEPH FARZAM LAW FIRM

By: /s/ Christopher F. Goodrich
CHRISTOPHER F. GOODRICH
Attorneys for Plaintiffs
SHIRRANE FRANKLIN, YVONNE BOWEN,
GRISelda RAMIREZ, CHESTRINA
GILLIAM, and JUAN GONTES

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ORDER

The Court, having reviewed the Joint Stipulation re: Revised Schedule for Depositions of Proposed Class Representative and Class Certification Briefing, hereby orders that the following schedule shall apply in *Gutierrez, et al. v. Los Angeles County Probation Department*, Case No. 24STCV06193, and in *Franklin, et al. v. Los Angeles County Probation Department*, Case No. 24STCV20182:

1. **February 13, 2026:** Deadline for all ten Plaintiffs in *Gutierrez* and *Franklin* (collectively, the “Proposed Class Representatives”) to attend their depositions.
2. **March 12, 2026:** Deadline for Defendant County of Los Angeles to file an Opposition to the Motion for Class Certification.
3. **March 26, 2026:** Deadline for the Proposed Class Representatives to file a Reply in support of their Motion for Class Certification.
4. ~~April 15, 2026 at 11:00 a.m.:~~ Hearing on the Motion for Class Certification.
April 28, 2026 at 11:00 a.m.

IT IS SO ORDERED.



Elihu M. Berle

Elihu M. Berle / Judge

DATED: 02/10/2026

Hon. Elihu M. Berle
Judge of the Los Angeles Superior Court