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11 Attorneys for Plaintiffs and Petitioners

12
13 SUPERIOR COURT OF THE STATE OF CALIFORNIA

14 FOR THE COUNTY OF SACRAMENTO

15 GORDON D. SCHABER COURTHOUSE

16 LUCKY CHANCES, INC.; V C CARDROOM,
INC.; HALCYON GAMING, LLC; PACIFIC
17 GAMING SERVICES, LLC; BJ GAMING,
LLC; FORTUNE PLAYERS GROUP, INC.;
18 GOLD GAMING CONSULTANTS, INC.;
CERTIFIED PLAYERS, INC.; LE GAMING,
19 INC.; and RHINO GAMING INC., on their
own behalf and on behalf of those similarly
20 situated,

21 Plaintiffs and Petitioners,

22 vs.

23 THE STATE OF CALIFORNIA;
CALIFORNIA GAMBLING CONTROL
24 COMMISSION; BUREAU OF GAMBLING
CONTROL, A DIVISION OF THE
25 CALIFORNIA DEPARTMENT OF JUSTICE;
FIONA MA, in her official capacity as the State
26 Treasurer; and DOES 1 through 20, Inclusive,

27 Defendants and Respondents.
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ELECTRONICALLY FILED

Superior Court of California
County of Sacramento

12/24/2025

By: R. Lopez Deputy

Case No. 34-2020-80003510-CU-MW-GDS

Judge: Lauri A. Damrell

Dept: 22

**JOINT STIPULATION RE: AMENDMENT
TO CLASS ADMINISTRATION
DEADLINES AND CONTINUANCE OF
FINAL APPROVAL HEARING**

Action Filed:

May 12, 2020

Trial Date:

TBD

1 Plaintiffs Lucky Chances, Inc., V C Cardroom Inc., Halcyon Gaming, LLC, Pacific Gaming
2 Services, LLC, BJ Gaming, LLC, Fortune Players Group, Inc., Gold Gaming Consultants, Inc.,
3 Certified Players, Inc., L.E. Gaming, Inc., and Rhino Gaming Inc. (“Plaintiffs”) and Defendants
4 Bureau of Gambling Control, California Gambling Control Commission, the State of California,
5 and the State Treasurer (“Defendants,” and together, the “Parties”), by and through their respective
6 attorneys of record, respectfully submit the following Joint Stipulation and [Proposed] Order
7 Regarding Amendment to Class Administration Deadlines and Continuance of Final Approval
8 Hearing:

9 1. On August 11, 2025, Plaintiffs filed their unopposed Amended Motion for
10 Preliminary Approval of Class Settlement requesting the Court approve the Parties’ Class Action
11 Settlement Agreement and Release (the “Settlement”) and set certain class administration deadlines.

12 2. On September 5, 2025, the Parties appeared for a hearing on the preliminary approval
13 motion. At the hearing, the Court requested limited amendments to the Settlement. The Parties and
14 the Court also discussed, among other things, the class administration deadlines and the Parties
15 indicated certain issues might arise which may result in the need to request, by joint stipulation,
16 adjustments concerning the class administration deadlines.

17 3. On September 22, 2025, based on amendments to the Settlement, the Court issued
18 its Order granting Plaintiffs’ Preliminary Approval Motion (the “Preliminary Approval Order”).
19 Paragraph 12 of the Preliminary Approval Order sets the Final Approval Hearing for April 24, 2026.
20 Paragraph 15 of the Preliminary Approval Order sets class administration deadlines, which begin to
21 run from the date of preliminary approval, i.e., September 22, 2025.

22 4. The first class administration deadline after the Preliminary Approval Order is the
23 deadline for providing class notice and claims forms to class members who are to be identified by
24 Defendants in the “Class List” (as that term is defined by the Settlement Agreement). Per the
25 Settlement Agreement, the Class List was also to include class information, including the amount
26 of fee revenues paid by given class members.

27 5. Pursuant to the Preliminary Approval Order, class notice was to be sent 30 days from
28 September 22, 2025. Based on the Preliminary Approval Order, all remaining class administration

1 deadlines—which the exception of the Final Approval Hearing—run from the initial date that class
2 notice is provided.

3 6. Before the preliminary approval hearing, Defendants had provided a document
4 presented as the “Class List.” Following issuance of the Preliminary Approval Order and Plaintiffs’
5 analysis of this document, the Parties have met and conferred since the Preliminary Approval Order
6 via e-mails, telephone conversations, and video conferences, and determined certain information in
7 the Class List was incomplete and/or required revision to effectuate the terms of the Settlement
8 Agreement and to provide “the best notice practicable under the circumstances and constitute valid,
9 due, and sufficient notice” to the class members, consistent with the Preliminary Approval Order.
10 (Preliminary Approval Order, at p. 3:25-26.)

11 7. To that end, Plaintiffs and Defendants undertook to explore additional data and
12 information to complete the Class List. As a result of these extensive meet and confer efforts, the
13 Class List has been improved and revised. The Parties are currently working to finalize the revised
14 Class List and provide it to the class administrator.

15 8. Given the unexpected length of time regarding the Parties’ efforts to complete the
16 Class List to effectuate proper notice, compliance with the original notice deadline (i.e., 30 days
17 after the Preliminary Approval Order) has now become impracticable. The Parties have thus
18 determined and agreed, in good faith, the deadline for sending class notice and claims forms should
19 be extended to until February 20, 2026.

20 9. Because the remaining class administration deadlines (with the exception of the Final
21 Approval Hearing) flow from the initial deadline for sending class notice and claims forms, no
22 modification of the subsequent class administration deadlines is required. Based, however, on the
23 continuance of the class notice deadline, the Parties also request a continuance of the Final Approval
24 hearing until a date at least 215 days after the notice date of February 20, 2026, i.e., on or after
25 September 23, 2026.

26 NOW THEREFORE, the Parties stipulate and agree, that:

27 (a) the Final Approval Hearing be continued to at least 215 days after February 20, 2026,
28 i.e., on or after September 23, 2026, as the Court’s calendar permits, and

1 (b) the class administration deadlines at Paragraph 15 of the Preliminary Approval Order
 2 should be amended to reflect the following changes indicated by bold and italic font:

3	Notice Date.	<i>On or before February 20, 2026.</i>
4	Date of sending Claims Form.	<i>On or before February 20, 2026.</i>
5	Objection Deadline.	60 days after Notice Date.
6	Initial Opt-Out Deadline.	60 days after Notice Date.
7	Claims Deadline.	60 days after Notice Date.
8	Deadline for Administrator to provide initial list of opt-outs	5 days after Initial Opt-Out Deadline.
9	Deadline for Administrator to provide objections to counsel.	5 days after Objection Deadline.
10	Deadline to file objections with Court.	15 days after Objection Deadline.
11	Deadline to withdraw request for exclusion	14 days after Administrator provides counsel initial list of opt outs (the "Final Opt-out Deadline").
12	Deadline for Administrator to provide final list of opt-outs	5 days after expiration of 14-day period after Administrator provides initial list of opt outs (i.e., Final Opt-out Deadline), for an outside total of 24 days after Initial Opt-out Deadline.
13	Deadline for the State to withdraw from Settlement based on opt-outs	30 days after receipt of final list of opt-outs, for a total of 54 days after Initial Opt-out Deadline.
14	Deadline to file proof of Notice of Settlement with Court.	15 days after Final Opt-Out Deadline.
15	Deadline for Claimants to provide additional information for Claims Form.	30 days after Claims Deadline.
16	Deadline for Administrator to provide final list of Class Members and amounts of Valid Claims.	45 days after Final Opt-out Deadline
17	Deadline to file motion for Final Approval.	16 court days before Final Approval Hearing.
18	Deadline to file motion for Attorneys' Fees and Costs / Service Awards.	16 court days before hearing on motion for Attorneys' Fees and Costs / Service Awards.
19	Final Approval Hearing.	As set by Court, at least 215 days after Preliminary Approval.
20	Motion for Attorneys' Fees and Costs.	As set by Court, at least 215 days after Preliminary Approval.
21	Effective Date.	Entry of Final Approval and Final Judgment (if no objections filed), or at expiration of appellate rights.
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1	Funding Date.	10 days after Effective Date.
2	Payment of Attorneys' Fees and Costs.	15 days after Funding Date.
3	Payment of Service Awards.	15 days after Funding Date.
4	Payment of Administrative Costs	15 days after Funding Date
5	Payment of Valid Claims.	15 days after Funding Date.
6	Expiration of settlement checks.	180 days after issuance of checks.

7 **IT IS SO STIPULATED.**

8 Dated: December 24, 2025

RUTAN & TUCKER, LLP
 DAVID P. LANFERMAN
 STEVEN J. GOON
 LUCAS K. HORI

11 By: /s/ Lucas K. Hori
 12 Attorneys for Plaintiffs and Petitioners

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 17 Danielle M. Guard
 Attorneys for Plaintiffs and Petitioners

19 ATTORNEY GENERAL OF CALIFORNIA
 20 ROB BONTA

21 By: /s/ Michael Sapoznikow
 22 Michael Sapoznikow
 23 Deputy Attorneys General
 Attorneys for All Defendants and
 Respondents

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF ORANGE**

3 I am employed by the law office of Rutan & Tucker, LLP in the County of Orange, State
4 of California. I am over the age of 18 and not a party to the within action. My business address is
18575 Jamboree Road, 9th Flr., Irvine, CA 92612. My electronic notification address is
5 dcorwin@rutan.com.

6 On December 24, 2025, I served on the interested parties in said action the within:

7 **JOINT STIPULATION RE: AMENDMENT TO CLASS ADMINISTRATION
8 DEADLINES AND CONTINUANCE OF FINAL APPROVAL HEARING; and**

9 **PROPOSED ORDER**

10 as stated below:

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25 (BY MAIL) by placing a true copy thereof in sealed envelope(s) addressed as shown
26 above.

27 In the course of my employment with Rutan & Tucker, LLP, I have, through first-hand
28 personal observation, become readily familiar with Rutan & Tucker, LLP's practice of collection
and processing correspondence for mailing with the United States Postal Service. Under that
practice, I deposited such envelope(s) in an out-box for collection by other personnel of Rutan &
Tucker, LLP, and for ultimate posting and placement with the U.S. Postal Service on that same
day in the ordinary course of business. If the customary business practices of Rutan & Tucker,
LLP with regard to collection and processing of correspondence and mailing were followed, and I
am confident that they were, such envelope(s) were posted and placed in the United States mail at
Costa Mesa, California, that same date. I am aware that on motion of party served, service is
presumed invalid if postal cancellation date or postage meter date is more than one day after date
of deposit for mailing in affidavit.

(BY FEDEX) by depositing in a box or other facility regularly maintained by FedEx, an
express service carrier, or delivering to a courier or driver authorized by said express

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service carrier to receive documents, a true copy of the foregoing document in sealed envelopes or packages designated by the express service carrier, addressed as shown above, with fees for overnight delivery provided for or paid.

(BY E-MAIL VIA ONE LEGAL) by transmitting a true copy of the foregoing document(s) to the e-mail addresses set forth above.

Executed on December 24, 2025, at Costa Mesa, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Debbie Corwin

(Type or print name)

/s/ Debbie Corwin

(Signature)