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12 Attorneys for Defendants ARTISAN SCREEN
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13 ESTATE INVESTMENT, LLC

14
15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**
17

18 LUIS IBARRA and ALBINA LOPEZ individually
and on behalf of others similarly situated and
19 aggrieved,

20 Plaintiffs,

21 vs.

22 ARTISAN SCREEN PRINTING, INC., a
California corporation; VASANT DOBARIA, an
23 individual; PRAFUL BAJARIA, an individual; C.P.
KHENI, an individual; ARTISAN SCREEN
24 PROCESS, INC., an entity of unknown form;
ARTISAN SCREEN PROCESS, an entity of
25 unknown form; ARTISAN SCREEN, an entity of
unknown form; ARTISAN SCREEN PROCESS
26 AND CUSTOM BLOW MOLDING, an entity of
unknown form; ARTISAN REAL ESTATE
27 INVESTMENT, LLC, a California limited liability
company; and DOES 6 through 50, inclusive,
28

Defendants.

CASE NO. BC644708

[Assigned for All Purposes to the Honorable David
S. Cunningham III, Department 11]

CLASS ACTION

JOINT STATUS REPORT

Date: December 14, 2021
Time: 9:00 a.m.
Dept.: 11

Action Filed: December 21, 2016
Trial Date: None Set

1 TO THE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 COME NOW Plaintiffs Luis Ibarra and Albina Lopez (“Plaintiffs”) and Defendants Artisan Screen
3 Printing, Inc., Vasant Dobarra, Praful Bajaria, C.P. Kheni, and Artisan Real Estate Investment, LLC
4 (“Defendants”) (collectively, the “Parties”) and hereby submit the following Joint Status Report in
5 advance of the December 14, 2021 Further Status Conference.

6 **I. CLASS NOTICE**

7 On September 7, 2021, the Honorable Ann I. Jones entered an order granting in part Plaintiffs’
8 Motion for Class Certification.

9 The Parties have agreed on a form of notice to be disseminated to the class, a true and correct copy
10 of which is attached hereto as **Exhibit A**. The Parties respectfully request that the Court review and
11 approve the proposed notice. The Parties have agreed to engage the services of CPT Group, Inc. to
12 administer the notice process.

13 **II. FIVE-YEAR DATE**

14 Pursuant to Code of Civil Procedure section 583.330(a), the Parties hereby stipulate and agree that
15 the last day of the time period within which the instant action shall be brought to trial under Code of Civil
16 Procedure section 583.310 shall be, and hereby is, extended to December 21, 2022.

17 **III. MEDIATION**

18 The Parties have scheduled a full day mediation session with Hon. Rita J. Miller (Ret.) of ADR
19 Services, Inc., set for February 11, 2022.

20 **IV. STATUS OF DISCOVERY AND PROPOSED DEADLINES**

21 On November 18, 2021, Plaintiffs served additional discovery seeking documents and information
22 related to the certified class in preparation for trial.

23 In light of the scheduled mediation, and to conserve resources, the Parties have discussed whether
24 to agree to an informal hold on discovery until after the mediation.

25 The Parties propose that the Court set a trial date in mid-November of 2022.

26 **V. ANTICIPATED POST-DISCOVERY LAW AND MOTION**

27 Plaintiffs reserve their right to file motions in limine and any other appropriate pretrial motions,
28 including motions related to bifurcation of issues.

1 Defendants also reserve their right to file motions in limine and any other appropriate pretrial
2 motions, including motions related to bifurcation of issues.


3 **VI. BIFURCATION OF ISSUES FOR TRIAL**

4 Plaintiffs reserve their right to seek bifurcation of issues for trial, including bifurcation as between
5 class claims and PAGA claims.

6 Defendants agree with Plaintiff's statement above; additionally, Defendants also reserve the right
7 to seek bifurcation of Plaintiff Luis Ibarra's claims against Defendants as this Court has ruled that the
8 class action proceeds as to Plaintiff Albina Lopez only and against Defendant Artisan Screen Printing,
9 Inc. only. Further, Defendants also reserve the right to seek bifurcation as to Plaintiff Albina Lopez's
10 individual claims against Defendants Dobaria, Bajaria, Kheni, and Artisan Real Estate Investment, LLC.

11
12 DATED: December 3, 2021

MATERN LAW GROUP, PC

13
14 By: 
15 _____
16 MATTHEW J. MATERN
17 MIKAEL H. STAHLE
18 JOSHUA D. BOXER

Attorneys for the Certified Class and Plaintiffs
LUIS IBARRA and ALBINA LOPEZ

19 DATED: December 3, 2021

LAW OFFICE OF THOMAS F. NOWLAND

20
21 By: 
22 _____
23 THOMAS F. NOWLAND
24 DANIEL A. BRODNAX
25 JOSEPH F. DESIDERIO

Attorneys for Defendants ARTISAN SCREEN
PRINTING, INC., VASANT DOBARIA, PRAFUL
BAJARIA, C.P. KHENI, and ARTISAN REAL
ESTATE INVESTMENT, LLC

EXHIBIT A