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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

BRIDGESTONE RETAIL OPERATIONS
WAGE AND HOUR CASES

) Case No. JCCP4638
) ORDER AUTHORIZING ELECTRONIC
) SERVICE
) Assigned for All Purposes to:
) Honorable Jane L. Johnson
) Dept. 308

Coordinated actions:

- Castillo v. Bridgestone Retail Operations, LLC
- Pham v. Bridgestone Retail Operations, LLC
- Dunn v. Bridgestone Retail Operations, LLC
- Geiling v. Bridgestone Retail Operations, LLC
- Phanthai v. Bridgestone Retail Operations, LLC

The Court has deemed this matter to be complex litigation within the meaning of the California Standards of Judicial Administration for Complex Litigation Section 19 and California Rules of Court, rule 3.400 et. seq. As such, this is a case that requires specialized management to avoid placing unnecessary burdens on the Court or the litigants, and to keep costs reasonable.

1 Pursuant to Code of Civil Procedure §187 and California Rule of Court 2.253(a), and the
2 stipulation of the parties, the Court finds that entry of this Order is necessary for the just and
3 more expeditious and efficient resolution of the above-captioned litigation.

4 When a party to this litigation wishes to serve a document to counsel of record, that party
5 shall effectuate service of the document by the procedure set forth in this Order (subject to the
6 exceptions outlined herein):

7
8 **I. LEXISNEXIS FILE & SERVE**

9 In order to facilitate case management, document retrieval and case organization, the
10 parties will utilize the services of LexisNexis File & Serve ("LNFS") and its litigation system
11 (the "System") for providing electronic service, storage and delivery of court-filed and
12 discovery-related documents through a secure website to facilitate expeditious, efficient and
13 economical communication by and amongst counsel. The Court, at its option, may also use
14 LNFS and its System for these purposes, and to communicate with counsel of record.

15
16 **II. SERVICE ONLY**

17 The System shall apply only to the service of documents, and not to their
18 filing. Original documents must still be filed in the traditional manner (i.e., filing the signed
19 original document with the Court), pursuant to the applicable California Rules of Civil Procedure
20 and Local Rules of such Court.

21
22 **III. SERVICE LIST & SIGN-UP**

23 Within five (5) days of this Order, Plaintiff's counsel shall submit to the
24 LNFS representative Keith Foote, at keith.foote@lexisnexis.com a complete and current service
25 list of counsel of record for this litigation. Within ten (10) days of this Order, each attorney of
26 record for this litigation, or within ten (15) days of the entry of appearance for a new attorney of
27 record, shall register for electronic service in this litigation by completing the application located
28 at the following website: <http://www.lexisnexis.com/fileandserve> (advanced registration).

1
2 **IV. SERVICE OF DOCUMENTS AND WEBSITE**

3 When any counsel of record wishes to serve a document, that counsel shall serve the
4 document according to all the requirements and procedures of this Order. All references to
5 "document" in this Order shall be interpreted to include any exhibits or attachments to the
6 document and shall include both pleadings and discovery-related documents (such as
7 interrogatories, requests for production, deposition notices/transcripts, etc.); provided, however,
8 that each attorney shall determine individually whether to utilize the System to serve
9 correspondence and/or the actual production of discovery documents in response to another
10 party's request for production. All documents including attachments or exhibits shall have the
11 attachments and exhibits bookmarked on the pdf documents uploaded to the LNFS website.

12 LNFS shall establish and maintain an Internet website (the "Website") for this litigation.
13 LNFS will post all documents served by the parties to the Website as provided in this Order and
14 shall serve each document on the parties included on the service list provided to LNFS in
15 accordance with the procedures herein.

16 Each attorney shall serve each document via electronic transfer of the document file to LNFS via
17 the Internet (either as a word-processing file or a scanned image of the document). Each
18 attorney shall title each document to identify the type and purpose of each document and the
19 party who is submitting such document. Each document electronically served pursuant to this
20 Order shall be deemed to have been served under the California Rules of Civil Procedure.
21 After LNFS receives a document, LNFS shall convert such document into Adobe Portable
22 Document Format ("PDF") and post it to the Website within one (1) hour of receipt.

23 Within one (1) hour of the time a document is posted to the Website, LNFS shall send an
24 email to all registered users notifying them that the document has been posted to the Website
25 (unless such registered user has declined to receive such email notifications). The email shall
26 contain hypertext link(s) to the document location(s) on the System (or, if so designated by the
27 recipient, the email shall have the served document attached thereto).

1 Electronic service shall be complete at the time of transmission, provided any period of
2 notice or any right or duty to do any act or make any response within any period or on a date
3 certain after the service of the document, which time period or date is prescribed by statute or
4 rule of court, shall be extended after service by electronic transmission by two court days, but the
5 extension shall not extend the time for filing notice of intention to move for new trial, notice of
6 intention to move to vacate judgment pursuant to Code of Civil Procedure § 663a, or notice of
7 appeal.

8 In the event a document that is to be filed with the Court is rejected by the Court for
9 filing after it has been posted on the Website by LNFS, the rejection was caused by an aspect of
10 the caption of the document, and the party seeking to file the document successfully files it with
11 the Court within two (2) business days of its rejection with revisions to the caption only, then the
12 party filing the document shall promptly submit a notice of successful filing, including the date
13 of the filing and the revised page(s) of the caption, to LNFS for posting on the Website. In all
14 other circumstances in which a document to be filed with the Court is rejected for filing after
15 LNFS has posted it on the Website, the party that caused the document to be posted shall
16 promptly notify LNFS in writing that the document was rejected by the Court for filing. LNFS
17 shall cause a permanent notation to be placed on the Website in conjunction with that document
18 memorializing the fact of rejection.

19 All documents posted on the System will be identified by: (a) the name of the serving law
20 firm; (b) the caption(s) of the case(s) to which the document belongs; (c) the title of the
21 document set forth on its caption; and (d) the identity of the party on whose behalf the document
22 is being served.

23 The System shall contain an index of all served documents for the litigation that will be
24 searchable and sortable according to methods that provide useful 24/7 365 days' access to the
25 documents.

26 Access to the System will be limited to registered users. Registered users will consist of
27 authorized Court personnel, counsel of record and their designated staff members. LNFS will
28 provide each registered user with a user name and password to access the System and the

1 documents served in the litigation. LNFS personnel will perform all administrative functions for
2 the System, but all initial data, additions, deletions or changes to the service list must be
3 approved by the Plaintiffs and Defendants.

4 Every pleading, document and instrument served electronically shall bear a facsimile or
5 typographical signature of at least one of the attorneys of record, along with the typed name,
6 address, telephone number and State Bar of California number of such attorney. Typographical
7 signatures shall be treated exactly as personal signatures for purposes of electronically served
8 documents under the California Rules of Civil Procedure. The serving party of any document
9 requiring multiple signatures (e.g., stipulations, joint status reports) must list thereon all the
10 names of other signatories by means of an "s/ ____" block for each. By submitting such a
11 document, the serving party certifies that each of the other signatories has expressly agreed to the
12 form and substance of the document and that the serving party has the actual authority to submit
13 the document electronically. The serving party must maintain any records evidencing this
14 concurrence for subsequent production to the Court if so ordered or for inspection upon request
15 by a party.

16 Any document transmitted to the System shall certify in the Proof of Service that a true
17 and correct copy was electronically served on counsel of record by transmission to LNFS.
18 Until further notice, documents filed under seal ("sealed documents") shall not be served through
19 the System. Instead, the service of sealed documents shall be made pursuant to the applicable
20 California Rules of Civil Procedure.

21 LNFS shall have available to counsel of record and the Court a 24-hour 365 days help
22 desk hotline at (888) 529-7587 and website <http://www.lexisnexis.com/fileandserve/support.asp>.
23 Any party appearing after the date of this order, shall have fifteen days from their initial
24 appearance to lodge any objections to this Order and to seek exemption. A copy of this Order
25 shall be served upon any newly appearing party with the initiating pleadings. Exemptions may be
26 granted in the discretion of the Court if it appears that a party would suffer undue hardship or
27 significant prejudice.
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Counsel for Plaintiff is Ordered to prepare, serve and file within 5 days, a Service List identifying all parties and their counsel which shall include the name of lead and backup attorneys, addresses, including email addresses, and telephone numbers for all counsel. Counsel for Plaintiff is further ordered to serve a copy of this ORDER AUTHORIZING ELECTRONIC SERVICE on all counsel concurrent with service of the Service List.

Lexis/Nexis shall activate the message board function for the above entitled case. All attorneys on the service list will automatically have access to the Message Boards and start to receive e-mail notifications of new message board postings. If an attorney does not want to receive the e-mail notifications or wants other staff members to receive e-mail notifications, they are to contact customer support at Lexis Nexis (888-529-7587). All attorneys will be charged \$6.00 per firm per month for this service.

IT IS SO ORDERED.

Dated: September ____, 2012

JANE L. JOHNSON
Judge of the Superior Court

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF RIVERSIDE:

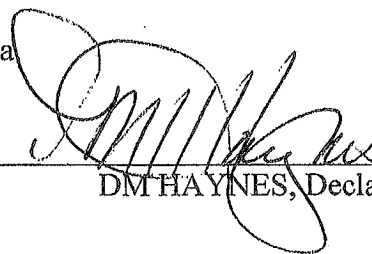
I, DM HAYNES, declare I am a citizen of the United States of America and am employed in Riverside, California; I am over the age of 18 years and am not a party to the within action; my business address is 4590 Allstate Drive, Riverside, California 92501-1702. On September 17, 2012, I served the within **ORDER AUTHORIZING ELECTRONIC SERVICE** in said action by placing a true copy thereof enclosed in sealed envelope(s) addressed as follows:

PLEASE SEE ATTACHED SERVICE LIST

I deposited such envelope(s) in the mail at our office. I am "readily familiar" with the firm's practice of collection and processing of correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on the same day, with postage thereon fully prepaid at Riverside, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after date of deposit for mailing stated in this Declaration.

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

Executed on September 17, 2012, at Riverside, California


DM HAYNES, Declarant

Fernandez & Lauby LLP
4590 Allstate Drive Riverside, Ca 92501
(951) 320-1444 Fax (951) 320-1445

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SERVICE LIST

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