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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

JED and ALISA BEHAR, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

NORTHROP GRUMMAN CORPORATION
and NORTHROP GRUMMAN SYSTEMS
CORPORATION,

Defendants.

Case No. 2:21-cv-03946-HDV-SK

CLASS ACTION

**JOINT STIPULATION TO AUTHORIZE
SUPPLEMENTAL DOOR HANGER
REMINDER NOTICE TO OWNER-
OCCUPIED CLASS PROPERTIES**

**JOINT STIPULATION TO AUTHORIZE SUPPLEMENTAL DOOR HANGER
REMINDER NOTICE TO OWNER-OCCUPIED CLASS PROPERTIES**

Plaintiffs Jed Behar and Alisa Behar, individually and on behalf of the Settlement Class, and
Defendants Northrop Grumman Corporation and Northrop Grumman Systems Corporation (collectively,
the “Parties”), by and through their respective counsel of record, hereby stipulate and jointly request as
follows:

WHEREAS, on July 28, 2026, the Court entered its Order Certifying Settlement Class,
Preliminarily Approving Class Action Settlement, and Approving the Form and Manner of Notice (ECF
No. 425) (the “Preliminary Approval Order”), and appointed A.B. Data, Ltd. as Class Administrator;

WHEREAS, in accordance with Paragraph 17 of the Preliminary Approval Order, the Class
Administrator caused the Notice Package to be mailed to Settlement Class Members by First-Class U.S.
mail on August 11, 2026, and Class Counsel notified the Court of that postmark date (ECF No. 427), such
that the Settlement Notice Date is August 11, 2026;

WHEREAS, Paragraph 23 of the Preliminary Approval Order directed the Class Administrator to
send a reminder postcard by First-Class U.S. mail thirty days after the postmark date of the Notice Package
to all Settlement Class Members who had not then submitted a Claim Form;

WHEREAS, the Class Administrator mailed the reminder postcard in accordance with Paragraph
23 on September 10, 2026, in both English and Spanish;

1 **WHEREAS**, the deadline for Settlement Class Members to opt out of the Settlement Class or to
2 object to the Settlement is September 25, 2026, and the deadline for Settlement Class Members to submit
3 claims is October 10, 2026;

4 **WHEREAS**, as of September 15, 2026, the Class Administrator has received 409 completed
5 Claim Forms from Settlement Class Members, and no opt out requests;

6 **WHEREAS**, Class Counsel, consistent with their obligations to the Settlement Class, wish to
7 undertake an additional reminder effort before the claims deadline in order to maximize the number of
8 eligible Settlement Class Members who submit valid claims and receive payment from the non-
9 reversionary Settlement Fund;

10 **WHEREAS**, the Parties propose that the Class Administrator arrange for the placement of door
11 hanger reminder notices at Class Area properties which shall be printed in both English and Spanish and
12 shall, at a high level, advise recipients that they may be a member of a class and may be entitled to a
13 significant payment if they submit a valid Claim Form, and shall include the case-specific website URL,
14 a scannable QR code linking to that website, and the case-specific toll-free telephone number, and shall
15 direct Settlement Class Members to those resources for further information and to submit a claim;

16 **WHEREAS**, to avoid delivering notice to persons who are not Settlement Class Members, such
17 as tenants and other non-owner occupants, and to avoid the confusion that such delivery could cause, the
18 Parties propose that door hangers be placed only at those Class Area properties for which the mailing
19 address reflected on the Settlement Class Member list is the same as the address of the Class Area property
20 itself, which properties appear to be owner-occupied;

21 **WHEREAS**, the door hanger reminder notice is supplemental to, and does not replace, alter, or
22 excuse any component of, the notice program approved in the Preliminary Approval Order, all of which
23 has been or is being carried out as ordered;

24 **WHEREAS**, the cost of the door hanger reminder notice is estimated to be approximately
25 \$4,428.00, and will be treated as an Administrative Cost under the Settlement Agreement, and the door
26 hanger campaign will be completed on or about September 24, 2026;
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1 **WHEREAS**, the Parties do not seek to modify any date, deadline, or other provision of the
2 Preliminary Approval Order, including the November 12, 2026 Final Approval Hearing; and

3 NOW, THEREFORE, the Parties hereby stipulate, and jointly request that the Court order, as
4 follows:

- 5 1. The Class Administrator is authorized to arrange for the placement of door hanger reminder
6 notices at Class Area properties in advance of the October 10, 2026 claims deadline.
- 7 2. The door hanger shall be printed in both English and Spanish and shall, at a high level, advise
8 recipients that they may be a member of a class and may be entitled to a significant payment
9 if they submit a valid Claim Form. The door hanger shall include the case-specific website
10 URL, a scannable QR code linking to that website, and the case-specific toll-free telephone
11 number, and shall direct Settlement Class Members to those resources for further information
12 and to submit a claim.
- 13 3. Door hangers shall be placed only at those Class Area properties for which the mailing address
14 reflected on the Settlement Class Member list is the same as the address of the Class Area
15 property.
- 16 4. Placement of the door hangers shall be substantially completed on or about
17 September 24, 2026.
- 18 5. The Class Administrator shall describe the door hanger reminder notice, including the number
19 of properties at which door hangers were placed and the dates of placement, in the declaration
20 of due diligence required by Paragraph 25 of the Preliminary Approval Order.
- 21 6. The door hanger reminder notice is supplemental to the notice program approved in the
22 Preliminary Approval Order and does not replace, alter, or excuse any component of that notice
23 program. Except as set forth herein, all terms, dates, deadlines, and provisions of the
24 Preliminary Approval Order remain in full force and effect, including the Final Approval
25 Hearing set for November 12, 2026 at 10:00 a.m. Pacific Time.
- 26 7. A proposed order is submitted herewith.

27 **IT IS SO STIPULATED.**
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1 Dated: September 17, 2026

2 THE LANIER LAW FIRM, P.C.

3
4 /s/ Ryan D. Ellis

5 Ryan D. Ellis (*pro hac vice*)

6 *Attorneys for Plaintiffs and the Settlement Class*

7 Dated: September 17, 2026

8 GIBSON, DUNN & CRUTCHER LLP

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10
11 /s/ Abbey Hudson (by permission)

12 Abbey Hudson

13 *Attorneys for Defendants Northrop Grumman*
14 *Corporation and Northrop Grumman Systems*
15 *Corporation*
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ATTESTATION

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

/s/ Ryan D. Ellis

Ryan D. Ellis (pro hac vice)

Attorney for Plaintiffs and the Settlement Class

CERTIFICATE OF SERVICE

I, Ryan D. Ellis, hereby certify that the foregoing JOINT STIPULATION was served on counsel for the Defendants through the Court's CM/ECF system on September 17, 2026.

/s/ Ryan D. Ellis

Ryan D. Ellis (pro hac vice)

Attorney for Plaintiffs and the Settlement Class