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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. 21-cv-03946-HDV-SK

**CLASS ACTION**

**JOINT STIPULATION TO AMEND THE  
DEADLINE FOR PRINTED PUBLICATION  
NOTICE SET FORTH IN PARAGRAPHS 19 AND  
32 OF THE PRELIMINARY APPROVAL ORDER**

**JOINT STIPULATION**

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 Amended 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**, Paragraph 19 of the Preliminary Approval Order provides that “[w]ithin 21 days of  
this Order, the Short Form Notice, in the form of a Publication Notice, will appear once in the publications  
*Los Angeles Daily News* and *Valley News Group* (*Warner Center News*, *Valley Vantage*, and *Calabasas*

1 *Enterprise*),” and the schedule set forth in Paragraph 32 sets the “Deadline for publication notice” as  
2 “Preliminary Approval Date + 21 days,” i.e., August 18, 2026;

3 **WHEREAS**, Paragraph 20 of the Preliminary Approval Order separately provides for digital  
4 banner advertisements to run for 30 days on the Google Display Network and YouTube platforms, in  
5 English and Spanish, geographically targeted to the affected Class Area;

6  
7 **WHEREAS**, on August 11, 2026, the Class Administrator caused the Notice Package to be mailed  
8 by First-Class U.S. mail to all Settlement Class Members identified by Class Counsel, and Class Counsel  
9 notified the Court of that postmark date in accordance with Paragraph 17 (ECF No. 427), such that the  
10 Settlement Notice Date for purposes of the Settlement Agreement and the Preliminary Approval Order is  
11 August 11, 2026. *See* Declaration of Rochelle J. Teichmiller “Teichmiller Decl.” ¶¶ 4–5;

12  
13 **WHEREAS**, in accordance with Paragraph 18 of the Preliminary Approval Order, the Class  
14 Administrator has identified personal email addresses of Settlement Class Members where feasible and is  
15 supplementing the mailed Notice Package by delivering notice to all Settlement Class Members for whom  
16 an email address can reasonably be located. *See* Teichmiller Decl. ¶ 5;

17  
18 **WHEREAS**, the case-specific website and the case-specific toll-free telephone number described  
19 in Paragraphs 21 and 22 of the Preliminary Approval Order have been operational since on or before the  
20 date of mailing. *See* Teichmiller Decl. ¶ 6;

21 **WHEREAS**, the digital component of the publication notice program described in Paragraph 20  
22 commenced on August 18, 2026, geographically targeted to California and specifically to the affected  
23 Class Area, with embedded links to the case-specific website. *See* Teichmiller Decl. ¶ 7;

24  
25 **WHEREAS**, as a result of a scheduling error in the placement of the print insertions, the Short  
26 Form Notice did not appear in print on or before August 18, 2026; the applicable insertion deadlines had  
27 passed by the time the error was identified, and the Class Administrator determined that the placements  
28

1 could not be advanced to earlier dates (*see* Teichmiller Decl. ¶¶ 8–9);

2       **WHEREAS**, the Short Form Notice is now scheduled to appear in the *Los Angeles Daily News* on  
3 Friday, August 21, 2026, and in the *Valley News Group* publications (*Warner Center News*, *Valley*  
4 *Vantage*, and *Calabasas Enterprise*) on Thursday, August 27, 2026. *See* Teichmiller Decl. ¶ 10;

5       **WHEREAS**, the Class Administrator is providing, at no additional cost to the Settlement Fund or  
6 the Settlement Class, additional digital impressions beyond those originally planned for the 30-day digital  
7 campaign, including placements targeting local newspaper websites. *See* Teichmiller Decl. ¶ 12;

8       **WHEREAS**, both revised print publication dates precede by a substantial margin each of the  
9 deadlines that the publication notice is intended to inform: the August 21 and August 27, 2026 publication  
10 dates fall 35 days and 29 days, respectively, before the September 25, 2026 deadline for Settlement Class  
11 Members to opt out or to object, and 50 days and 44 days, respectively, before the October 10, 2026  
12 deadline to submit claims;

13       **WHEREAS**, direct mail notice to all Settlement Class Members identified from the records of the  
14 Los Angeles County Assessor’s Office was completed on schedule, and the reminder postcard notice  
15 required by Paragraph 23 remains on schedule. *See* Teichmiller Decl. ¶¶ 4–5, 13;

16       **WHEREAS**, the Class Administrator has advised the Parties that the brief delay in the  
17 commencement of print publication is not expected to adversely affect the efficacy of the Court-approved  
18 Notice Program, and remains the best notice practicable under the circumstances. *See* Teichmiller Decl.  
19 ¶¶ 14–17;

20       **WHEREAS**, the delay in print publication was occasioned by a scheduling error on the part of the  
21 Class Administrator and the publication schedule of the selected periodicals rather than by any act or  
22 omission of the Parties or their counsel, was promptly disclosed to counsel (*see* Teichmiller Decl. ¶ 11),  
23 is promptly brought to the Court’s attention by this Stipulation, is brief, and does not affect any other date  
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1 or deadline in this action;

2       **WHEREAS**, the Parties do not seek to modify any other date, deadline, or provision of the  
3 Preliminary Approval Order, including the November 12, 2026 Final Approval Hearing; and

4       **WHEREAS**, the Class Counsel believes that the interests of the Settlement Class are best served  
5 by advising the Court of the revised print publication dates and by conforming the Preliminary Approval  
6 Order to those dates;  
7

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

- 10       1. Paragraph 19 of the Preliminary Approval Order is amended to read as follows: “The  
11       Short Form Notice, in the form of a Publication Notice, will appear once in the  
12       publication *Los Angeles Daily News* on or about August 21, 2026, and once in the  
13       *Valley News Group* publications (*Warner Center News*, *Valley Vantage*, and *Calabasas*  
14       *Enterprise*) on or about August 27, 2026.”
- 15       2. The row of the schedule set forth in Paragraph 32 of the Preliminary Approval Order  
16       titled “Deadline for publication notice” is amended from “Preliminary Approval Date  
17       + 21 days” to “August 27, 2026.”
- 18       3. The Notice Program, as so modified, continues to constitute the best notice practicable  
19       under the circumstances and satisfies the requirements of Rule 23 of the Federal Rules  
20       of Civil Procedure and due process.
- 21       4. The Class Administrator shall address the print publication described above in the  
22       declaration of due diligence required by Paragraph 25 of the Preliminary Approval  
23       Order, and shall attach proof of publication for each publication identified in Paragraph  
24       19 as amended.  
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1 5. Except as expressly modified herein, all other terms, dates, deadlines, and provisions  
2 of the Preliminary Approval Order remain in full force and effect, including the Final  
3 Approval Hearing set for November 12, 2026 at 10:00 a.m. Pacific Time.

4 **IT IS SO STIPULATED.**

5  
6 Dated: August 20, 2026

7 **THE LANIER LAW FIRM, P.C.**

8  
9 /s/ Ryan D. Ellis

10 Ryan D. Ellis

11 *Attorneys for Plaintiffs and the Settlement Class*

12 Dated: August 20, 2026

13  
14 **GIBSON, DUNN & CRUTCHER LLP**

15 /s/ Abbey Hudson (by permission)

16 Abbey Hudson

17 *Attorneys for Defendants Northrop Grumman*  
18 *Corporation and Northrop Grumman Systems*  
19 *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

*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 August 20, 2026.

/s/ Ryan D. Ellis

Ryan D. Ellis

*Attorney for Plaintiffs and the Settlement Class*