

1 Andre A. Khansari, Esq. (SBN 223528)
2 *andre@khansarilaw.com*
3 Peter T. Sato, Esq., Of Counsel (SBN 238486)
4 *peter@khanarilaw.com*
5 KHANSARI LAW CORPORATION
6 Warner Center Towers
7 21650 Oxnard Street, Suite 1540
8 Woodland Hills, California 91367
9 Telephone: (818) 650-6444
10 Facsimile: (818) 650-6445

11 Attorneys for Plaintiff,
12 CA CITIZEN PROTECTION GROUP, LLC

FILED
Superior Court of California
County of Alameda

04/30/2026

Clerk of the Court, Executive Officer / Clerk of the Court

By: A. Ampsonah Deputy

A. Ampsonah

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **COUNTY OF ALAMEDA - RENE C. DAVIDSON COURTHOUSE**

15 CA CITIZEN PROTECTION GROUP,
16 LLC,

17 Plaintiff,

18 v.

19 1616 HOLDINGS, INC.; FIVE BELOW,
20 INC.; and DOES 1 to 50,

21 Defendants.

Case No. 24CV100413

(Assigned for All Purposes to:
Hon. Ruben Sundeen – Dept. 23)

~~PROPOSED~~ **ORDER APPROVING
PROPOSITION 65 SETTLEMENT
AND STIPULATED CONSENT
JUDGMENT**

Date: April 16, 2026

Time: 02:30 p.m.

Dept.: 23

Complaint filed: May 15, 2024

Trial Date: None.

[Reservation No. 544844886559]

22 Plaintiff CA CITIZEN PROTECTION GROUP, LLC (“CCPG” or “Plaintiff”),
23 on the one hand, and Defendant 1616 HOLDINGS, INC. (“1616”) and Defendant FIVE
24 BELOW, INC. (“Five Below”, and together with 1616, collectively referred to as
25

1 “Defendants”), on the other hand, have agreed to the terms of the settlement
2 memorialized in the [Proposed] Stipulated Consent Judgment (the “Stipulated Consent
3 Judgment”), attached as Exhibit “A” to the Declaration of Andre A. Khansari in support
4 of the Motion to Approve and Enter the [proposed] Stipulated Consent Judgment (the
5 “Motion”), and Plaintiff has moved this Court for an Order approving the settlement and
6 entering the [proposed] Stipulated Consent Judgment.

7 After consideration of the papers submitted and the arguments presented, as
8 applicable, the Court finds that the settlement agreement set forth in the Stipulated
9 Consent Judgment meets the criteria established by California Health & Safety Code §
10 25249.7(f)(4), in that:

- 11 1. The injunctive relief required by the Stipulated Consent Judgment complies
12 with Proposition 65;
- 13 2. The civil penalty amount to be paid pursuant to the Stipulated Consent
14 Judgment is reasonable; and
- 15 3. The reimbursement of fees and costs provided by the Stipulated Consent
16 Judgment is reasonable under California law.

17 Accordingly, the Motion is GRANTED.

18
19 **IT IS SO ORDERED.**

20
21
22 Dated: 04/30/2026



23 _____
24 JUDGE OF THE SUPERIOR COURT
25 **Ruben Sundeen / Judge**
26
27
28