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8 Attorneys for Defendant, NIBCO, INC.

9 UNITED STATES DISTRICT COURT  
10 EASTERN DISTRICT OF CALIFORNIA

11 MARTHA RIVERA, MAO HER, ALICIA  
12 ALVAREZ, EV A ARRIOLA, PEUANG  
13 BOUNNHONG, CHHOM CHAN, BEE LEE,  
14 PAULA MARTINEZ, MARIA MEDINA,  
15 MAI MEEMOUA, MARGARITA  
16 MENDOZA, BAO NHIA MOUA, ISIDRA  
17 MURILLO, MARIA NAVARRO,  
18 VATHRATTANATAY, OFELIA RIVERA,  
19 SARA RIVERA, MARIA RODRIGUEZ,  
20 MARIA RUIZ, MARIA VALDIVIA, SY  
21 VANG, YOUA XIONG and SEE YANG,

22 Plaintiffs,

23 v.

24 NIBCO, INC., an Indiana corporation,

25 Defendant.

Case No.: 1:99-cv-06443-JLT-HBK

**STIPULATION TO EXTEND THE  
TIME FOR DEFENDANT NIBCO, INC.  
TO RESPOND TO ADMINISTRATIVE  
MOTION OF CHRISTOPHER HO TO  
UNSEAL CERTAIN FILINGS AND  
ORDER RELATING TO THE  
PARTIES' CROSS MOTIONS FOR  
SUMMARY JUDGMENT AND  
[PROPOSED] ORDER THEREON**

26 **STIPULATION**

27 1. Christopher Ho, one the former Plaintiffs' counsel in the above-referenced matter,  
28 has filed an Administrative Motion to Unseal Certain Filings and Order Relating to the Parties'  
Cross Motions for Summary Judgment ("Administrative Motion").

2. On January 30, 2024, Defendant Nibco, Inc., through counsel, accepted service of  
this Administrative Motion.

3. On January 30, 2024, the Court issued its Minute Order giving Defendant Nibco, Inc.  
21 days from the date of service to file a response to the motion. By Defendant Nibco, Inc.'s

1 calculation, the current deadline to respond is February 20, 2024.

2 4. Additional time is needed to respond to the Administrative Motion. Defendant  
3 Nibco, Inc. has thus requested, and the Plaintiff has agreed, to extend the deadline to Friday,  
4 February 23, 2024. This Stipulation is being submitted to the Court pursuant to that agreement.

5 Defendant Nibco, Inc. respectfully requests that the Court grant that additional time.

6  
7 Dated: February \_\_\_\_, 2024

LEGAL AID AT WORK

8  
9 By: \_\_\_\_\_  
Christopher Ho

10  
11 Dated: February \_\_\_\_, 2024

SAGASER, WATKINS & WIELAND PC

12  
13 By: \_\_\_\_\_  
14 William C. Haesy  
Attorneys for Defendant, NIBCO, INC.

15  
16 **[PROPOSED] ORDER**

17 The Court having reviewed the foregoing Stipulation and good cause appearing therefor:

18 IT IS HEREBY ORDERED that the deadline for Nibco, Inc. to respond to the  
19 Administrative Motion of Christopher Ho to Unseal Certain Filings and Order Relating to the  
20 Parties' Cross Motions for Summary Judgment shall be extended to and including Friday, February  
21 23, 2024.

22 IT IS SO ORDERED.

23  
24 Dated: **February 14, 2024**

  
UNITED STATES DISTRICT JUDGE