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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

15 RAFAEL MUNOZ, LIDIA CRUZ, YANET)
16 HERNANDEZ, SANTOS R. VALENZUELA,)
17 TRINIDAD RUIZ, MARTA A. RINCON de)
18 DIAZ, RAMON CERVANTES PERALES)
19 and HUGO PEREZ RIOS on behalf of)
20 themselves, and all current and former)
21 employees, and on behalf of a class of)
22 similarly situated employees,)

23 Plaintiffs,)

24 vs.)

25 GIUMARRA VINEYARDS CORPORTION,)
26 a California corporation, and DOES 1-20,)
27)
28)

29 Defendants.)
30)
31)

Case No.: 1:09-cv-00703-AWI-JLT

**STIPULATION TO EXTEND TIME TO
FILE OBJECTIONS TO PROPOSED
FINDINGS AND RECOMMENDATIONS
REGARDING CLASS CERTIFICATION**

Defendant Giumarra Vineyards Corporation (“Giumarra”) and Plaintiffs stipulate and agree to the following:

1 WHEREAS, Magistrate Judge Thurston issued findings and recommendations granting in
2 part and denying in part plaintiffs' motion for class certification on July 5, 2012;

3 WHEREAS, Defendants' counsel Joseph E. Herman is seriously ill and has been advised
4 by his doctor not to work for the next two weeks;

5 WHEREAS, Defendants' counsel Joseph C. Markowitz is in the process of moving his
6 office. The move is scheduled for July 22, 2012, and the office will be disrupted in preparation
7 for the move.

8 WHEREAS, in light of these severe time constraints, and the complexity of the issues
9 raised by the voluminous record on the class certification, the parties need additional time to
10 complete their papers.

11 WHEREAS, the parties agree that they will continue to pursue merits-related discovery
12 with Defendant continuing to make documents available to Plaintiffs and arranging for Plaintiffs
13 to scan and/or copy documents beginning July 24, 2012.

14 THEREFORE, IT IS HEREBY STIPULATED AND AGREED AND THE COURT IS
15 REQUESTED TO ORDER THE FOLLOWING:

16 Pursuant to 28 U.S.C. §636(b) (1)(B) and (c) and Local Rule 304(b), the time
17 to file objections to the findings and recommendations of Magistrate Judge Thurston dated July
18 5, 2012 is extended to and including August 2, 2012.

19
20 Dated: July 12, 2012

LAW OFFICES OF JOSEPH E. HERMAN

21 By: /s/ Joseph E. Herman
22 Joseph E. Herman

23
24 Dated: July 12, 2012

LAW OFFICES OF JOSEPH C. MARKOWITZ

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26 By: /s/ Joseph C. Markowitz
27 Joseph C. Markowitz
28 Attorneys for Defendant,
Giumarra Vineyards Corporation

1 Dated: July 12, 2012

MALLISON & MARTINEZ

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3 By: /s/ Stan S. Mallison

4 Stan S. Mallison

5 Attorney for Plaintiffs,

6
7 **ORDER**

8
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11 IT IS SO ORDERED.

12 Dated: July 16, 2012

13 
14 CHIEF UNITED STATES DISTRICT JUDGE