1		The Honorable Michael J. Sei	
2			
3	LAW OFFICES OF WILLIAM C. HAHESY		
4	1	Bar No. 105743	
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13	Attorneys for DELANO FARMS COMPANY		
14			
15	UNITED STATES DISTRICT COURT		
	EASTERN DISTRICT OF CA	LIFORNIA AT FRESNO	
16	SABAS ARREDONDO, JOSE CUEVAS,		
17	HILARIO GOMEZ, IRMA LANDEROS, and	NO. 1:09-cv-01247-MJS	
18	ROSALBA LANDEROS individually, and on behalf of all others similarly situated,	STIPULATION AND ORDER	
19	•	REGARDING MEDIATION SCHEDULING AND ORAL	
	Plaintiffs,	ARGUMENT ON MOTION FOR	
20	v.	DECERTIFICATION	
21	DELANO FARMS COMPANY, a Washington		
22	State Corporation; CAL-PACIFIC FARM		
23	MANAGEMENT, L.P.; T&R BANGI'S AGRICULTURAL SERVICES, INC., and		
	DOES 1 through 10, inclusive,		
24	Defendants.		
25			
26	I. STIPULATION AND JOINT MOTION		

The parties have diligently pursued arrangements for mediation since appearing for a

STIPULATION AN ORDER REGARDING MEDIATION SCHEDULING AND ORAL ARGUMENT ON MOTION FOR DECERTIFICATION - 1

No. 1:09-cv-01247

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SAVITT BRUCE & WILLEY LLP 1425 Fourth Avenue Suite 800 Seattle, Washington 98101-2272 (206) 749-0500

Status Conference with Judge Boone, and now have identified a mediator acceptable to all parties and have scheduled mediation with that mediator for June 21, 2013, the first date on which all necessary counsel, parties, and the mediator are available.

The parties note that this mediation is several weeks after the deadline for mediation (May 31, 2013) established by Judge Boone, and only a few days prior to the date currently set for oral argument of defendants' motions to decertify and for a trial plan.

The parties therefore respectfully request and suggest that this Court (a) extend the deadline for mediation to June 21, 2013, and (b) re-schedule oral argument on defendants' pending motions, as jointly stipulated to and requested below. The requesting scheduling adjustments may facilitate the non-judicial resolution of this matter and, should mediation fail, will allow the Court adequate time for review of the submittals on the pending motion prior to oral argument.

The parties to the above-captioned matter, through their respective counsel of record, hereby stipulate to and jointly request the following dates for mediation and for oral argument on the pending motions:

June 21, 2013	Deadline for mediation
June 24, 2013	Parties to advise Court of outcome of mediation
July 19, 2013, 9:30 am	Oral argument on defendants' pending motions
SO STIPULATED:	

SAVITT BRUCE & WILLEY LLP

GRISWOLD, LASALLE, COBB, DOWD & GIN, LLP

By /s/ David N. Bruce	By/s/ Michael R. Johnson
David N. Bruce, Pro Hac Vice	Michael R. Johnson, State Bar No. 237767
Miles A. Yanick, Pro Hac Vice	

Attorneys for Delano Farms Company

Attorneys for Cal-Pacific Farm Management,
L.P., and T&R Bangi's Agicultural Services,
Inc.

STIPULATION AN ORDER REGARDING MEDIATION SCHEDULING AND ORAL ARGUMENT ON MOTION FOR DECERTIFICATION - 2 No. 1:09-cv-01247

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$\begin{bmatrix} 1 \\ 2 \end{bmatrix}$	LAW OFFICES OF WILLIAM C. HAHESY	LAW OFFICES OF MARCOS CAMACHO	
3	D /-/ W'. W' - C H 1	Dec. /a/M is C M is	
4	By /s/ William C. Hahesy William C. Hahesy, State Bar No. 105743	By /s/ Mario G. Martinez Mario G. Martinez, State Bar No. 200721	
5	Attorneys for Delano Farms Company	Attorneys for Plaintiffs Sabas Arredondo, et al	
6	II. [PROPOSED] ORDER		
7	Presented by:		
8	SAVITT BRUCE & WILLEY LLP		
9	By/s/ David N. Bruce		
10	David N. Bruce, Pro Hac Vice		
11	Miles A. Yanick, <i>Pro Hac Vice</i>		
12	Attorneys for Delano Farms Company		
13			
14	LAW OFFICES OF WILLIAM C. HAHESY		
15	By/s/ William C. Hahesy		
16	William C. Hahesy, State Bar No. 105743 Attorneys for Delano Farms Company		
17			
18	GRISWOLD, LASALLE, COBB, DOWD & GIN, LI	LP	
19	By/s/ Michael R. Johnson		
20	Michael R. Johnson, State Bar No. 237767		
21	Attorneys for Cal-Pacific Farm Management, L.P.,		
22	and T&R Bangi's Agicultural Services, Inc.		
23			
24	LAW OFFICES OF MARCOS CAMACHO		
	By /s/ Mario G. Martinez		
25	By /s/ Mario G. Martinez Mario G. Martinez, State Bar No. 200721		
26	Attorneys for Plaintiffs Sabas Arredondo, et al		
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	STIPULATION AN ORDER REGARDING MEDIATION SCHEDULING AND ORAL ARGUMENT ON MOTION OF THE PROPERTY OF THE PROPERT	1/25 Hougeth Avenue Suite 800	

DECERTIFICATION - 3

No. 1:09-cv-01247

(206) 749-0500

STIPULATION AN ORDER REGARDING MEDIATION SCHEDULING AND ORAL ARGUMENT ON MOTION FOR DECERTIFICATION - 4 No. 1:09-cv-01247 SAVITT BRUCE & WILLEY LLP 1425 Fourth Avenue Suite 800 Seattle, Washington 98101-2272 (206) 749-0500