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19 Attorneys for Defendant DELANO FARMS COMPANY

20 **UNITED STATES DISTRICT COURT**  
21 **EASTERN DISTRICT OF CALIFORNIA**

22 SABAS ARREDONDO, JOSE CUEVAS,  
23 HILARIO GOMEZ, IRMA LANDEROS,  
24 and ROSALBA LANDEROS individually,  
25 and on behalf of all others similarly situated,

26 Plaintiffs,

27 v.

28 DELANO FARMS COMPANY, a  
29 Washington State Corporation; CAL-  
30 PACIFIC FARM MANAGEMENT, L.P.;  
31 T&R BANGI'S AGRICULTURAL  
32 SERVICES, INC., and DOES 1 through 10,  
33 inclusive,

34 Defendants.

Case No. 1:09-cv-01247 MJS

**JOINT STIPULATION AND ORDER RE  
HEARING ON MOTIONS FOR  
DECERTIFICATION AND FOR A  
TRIAL PLAN**

**STIPULATION AND JOINT MOTION**

WHEREAS, the above-captioned Parties participated in a full day of mediation on July 3, 2013, in San Francisco, California, with mediator David Rudy;

WHEREAS, since mediation, the Parties have agreed to tentatively settle the above-captioned lawsuit, subject to their negotiation of the remaining terms;

1 WHEREAS, since mediation, the Parties have been exchanging documentation and  
2 discussing the remaining terms;

3 WHEREAS, the Parties participated in a further mediated session with David Rudy on  
4 August 14, 2013, to assist in the negotiation of the remaining terms, which efforts resulted in  
5 further tentative agreement on some of the remaining terms and the establishment of a schedule  
6 designed to assist in reaching agreement on the remaining terms;

7 WHEREAS, the hearing on Defendants' motions for decertification and for a trial plan  
8 ("Hearing") is presently on calendar for Friday, August 30, 2013;

9 WHEREAS, continuance of the Hearing is in the best interests of the Parties and will  
10 allow time necessary to consummate a binding settlement agreement, which would then be  
11 subject to Court approval;

12 WHEREAS, the Parties wish to prevent unnecessary expenditure of judicial resources;  
13 and

14 WHEREAS, the nearest regular motion hearing date available to all Parties is Friday,  
15 September 27, 2013, which date has been agreed to by the Parties as part of the schedule  
16 mentioned above;

17 THEREFORE, the Parties do hereby stipulate and respectfully request that the Hearing  
18 be continued to Friday, September 27, 2013.

19 **SAVITT BRUCE & WILLEY LLP**

**GRISWOLD, LASALLE, COBB, DOWD & GIN, LLP**

20  
21 By /s/ David N. Bruce  
22 David N. Bruce, *Pro Hac Vice*  
23 Miles A. Yanick, *Pro Hac Vice*  
24 Attorneys for Defendant, Delano Farms  
25 Company

By /s/ Michael R. Johnson  
Michael R. Johnson  
Attorneys for Defendants, Cal-Pacific Farm  
Management, L.P., and T&R Bangi's Agricultural  
Services, Inc.

26 **LAW OFFICES OF WILLIAM C. HAHESY**

**MYERS, WIDDERS, GIBSON, JONES & FEINGOLD,  
LLP**

27 By /s/ William C. Hahey  
28 William C. Hahey  
Attorneys for Defendant, Delano Farms  
Company

By /s/ James E. Perero  
James E. Perero  
Attorneys for Plaintiffs Sabas Arredondo, *et al.*

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**ORDER**

Based on the foregoing stipulation, the Court hereby orders that the hearing on Defendants' motions for decertification and a trial plan shall take place on Friday, September 27, 2013, at 11:00 a.m. in Courtroom 6, United States District Court, Fresno, California.

IT IS SO ORDERED.

Dated: August 20, 2013

/s/ Michael J. Seng  
UNITED STATES MAGISTRATE JUDGE