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Attorneys for Defendant DELANO FARMS COMPANY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA AT FRESNO

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

NO. 1:09-cv-01247-MJS

Plaintiffs.

V.

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

**STIPULATION AND ORDER
REGARDING MODIFICATION OF
SCHEDULING ORDER**

Defendants.

Having met and conferred, the Parties hereby submit that good cause exists to modify the schedule contained in the Court's Minute Order (Doc. 453), as required by Federal Rule of Civil Procedure 16(b)(4). On August 24, 2016, the Parties mediated, have reached a tentative settlement, and are now in the process of preparing a stipulation of settlement that the Parties

1 anticipate will become the basis first for a motion for preliminary approval of the settlement
2 and ultimately for its final approval.
3

4 The Parties hereby stipulate as follows:
5

6 1. Plaintiffs' deadline to file a modified trial plan and proposed schedule of further
7 proceedings on September 12, 2016, should be vacated. All subsequent dates set forth in the
8 schedule contained in the Court's Minute Order (Doc. 453), should also be vacated.
9

10 2. Subject to the Court's approval, the Parties will instead report to the Court on
11 their progress in a telephonic status conference, to take place within 15 days of entry of this
12 order.
13

14 SO STIPULATED:
15

16 **SAVITT BRUCE & WILLEY LLP**

17 By /s/ David N. Bruce (as authorized on
18 9/9/2016)

19 David N. Bruce, *Pro Hac Vice*
Miles A. Yanick, *Pro Hac Vice*

20 Attorneys for Delano Farms Company

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

22 By /s/ William C. Hahesy (as authorized
23 On 9/9/2016)

24 William C. Hahesy, State Bar No. 105743

25 Attorney for Delano Farms Company

19 **McCORMICK BARSTOW LLP**

20 By /s/ D. Greg Durbin (as authorized on
21 9/8/2016)

22 D. Greg Durbin, State Bar No. 81749
Laura A. Wolfe, State Bar No. 266751

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

24 **MARTINEZ AGUILASOCHO & LYNCH**

25 By /s/ Mario Martinez (as authorized on
26 9/9/2016)

27 Mario Martinez, State Bar No. 200721
Thomas Patrick Lynch, State Bar No. 159277

28 Attorneys for Plaintiffs

ORDER

Having considered the proposed Stipulation and Order Re: Modification of Scheduling Order in Case No. 1:09-cv-01247-MJS and good cause appearing, the Court Orders as follows:

1. Plaintiffs' September 12, 2016, deadline to file a modified trial plan and proposed schedule of further proceedings and all subsequent dates set forth in the Court's Minute Order (Doc. 453) are vacated.
2. A telephonic Status/Scheduling Conference shall be held at 4:00 P.M. October 12, 2016. (The parties shall participate by dialing 888.204.5984 and entering access code 4446176.)
3. Forty eight hours before the October 12, 2016, Status/Scheduling Conference, the parties shall submit a collective status report confirming that all terms of settlement of this case have been agreed to by all parties and reduced to a writing signed by all (or, if not so agreed and signed, an explanation as to why not and a proposed deadline for same) and an agreed schedule for all further proceedings in the case.
4. The parties are commended for negotiating a resolution of this old and complex case.

IT IS SO ORDERED.

Dated: September 12, 2016

/s/ *Michael J. Seng*
UNITED STATES MAGISTRATE JUDGE