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8 UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA AT FRESNO

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

14 Plaintiffs,

15 v.

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

21 Defendants.

NO. 1:09-cv-01247-MJS

**STIPULATION AND ORDER  
GRANTING LEAVE TO FILE  
AMENDED COMPLAINT**

22 The Parties, by and through their respective counsel of record and pursuant to Fed. R.  
23 Civ. P. 15(a)(2), hereby stipulate as follows:

24 1. That Plaintiffs shall file the Amended *Arredondo* Complaint, attached to this  
25 stipulation as Exhibit A, concurrently with the filing of this stipulation.

26 2. This stipulation is being provided solely for the purpose of effectuating the  
27 Parties' Settlement Agreement.

3. In the event the Settlement is terminated or fails to become effective for any  
reason, the Parties to the Settlement will be deemed to have reverted to their respective  
litigation positions as of August 24, 2016. In that event, this stipulation will have no effect, the

1 Amended *Arredondo* Complaint shall be withdrawn and stricken, and the *Arredondo* Complaint  
2 filed on July 17, 2009 (ECF No. 2) will remain the operative complaint.

3 4. No pleadings or motions shall be filed in response to the Amended *Arredondo*  
4 Complaint, as it is being filed solely for the purposes of effectuating the Parties' Settlement  
5 Agreement.

6 SO STIPULATED:

7 **SAVITT BRUCE & WILLEY LLP**

**MCCORMICK BARSTOW LLP**

9 By /s/ David N. Bruce (as authorized on  
10 11/18/2016)

By /s/ D. Greg Durbin (as authorized on  
11 11/18/2016)

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

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

14 Attorneys for Delano Farms Company

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

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

**MARTINEZ AGUILASOCHO & LYNCH**

16 By /s/ William C. Hahesy (as authorized on  
17 11/18/2016)

By /s/ Mario Martinez (as authorized on  
18 11/18/2016)

19 William C. Hahesy, State Bar No. 105743

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

20 Attorney for Delano Farms Company

Attorneys for Plaintiffs

21 **ORDER**

22 Good cause appearing, the above Stipulation is accepted and adopted as the  
23 Order of this Court.

24 IT IS SO ORDERED.

25 Dated: February 14, 2017

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

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STIPULATION AND ORDER GRANTING LEAVE  
TO FILE AMENDED COMPLAINT - 3  
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STIPULATION AND ORDER GRANTING LEAVE  
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