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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

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

Plaintiffs,

vs.

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,

Defendants.

CASE NO. 1:09-CV-01247-LJO-DLB

STIPULATION AND PRELIMINARY
 INJUNCTION

For GOOD CAUSE, the Parties to this action respectfully file this Stipulation and Preliminary Injunction. In accordance with the Court's Order granting Plaintiffs' Temporary Restraining Order, dated August 10, 2010, and the Court's Minute Order dated August 23, 2010, the Parties have met and conferred regarding the need for a preliminary injunction and the proposed terms of a preliminary injunction. In a good faith effort to

resolve the matter, the Parties have come to an agreement.

As such and subject to the Court's approval, the Parties have agreed and hereby stipulate to the following: (1) The Court will issue a preliminary injunction to remain in place throughout the duration of the litigation of this case; and (2) the proposed terms of the preliminary injunction mirror the terms of the Temporary Restraining Order, and are as follows:

(i) Delano Farms Company, Cal Pacific Farm Management, L.P., and T&R Bangi's Agricultural Services, Inc., (hereinafter collectively referred to as "Defendants") and their supervisors, including, but not limited to, Manuel Guzman, as well as officers, agents, managers and employees of Defendants, and any other persons in active concert with Defendants be, and hereby are, enjoined and restrained from engaging in or performing the following:

(a) taking any retaliatory measures or other adverse actions based on retaliatory intent affecting identified plaintiffs, identified and/or reasonably known putative class members, and identified and/or reasonably known potential witnesses, in *Arredondo, et. al. v. Delano Farms Company, et. al.*;

(b) taking any action calculated to discourage current or past employees of Defendants from free and open association with any identified plaintiff, identified and/or reasonably known putative class member, or identified and/or reasonably known potential witness in *Arredondo, et. al. v. Delano Farms Company, et. al.*;

(c) discharging, firing, terminating, suspending, failing to pay, disciplining or taking any other similar adverse action which has the anticipated or intended effect of precluding or discouraging any current employee of Defendants from testifying, assisting

or participating in any proceeding, hearing or investigation in this action, provided, however, that nothing in this preliminary injunction shall prevent Defendants from making normal and customary hiring and firing decisions in the normal course of business.

IT IS FURTHER ORDERED that Defendants shall post, distribute and deliver a copy of this Preliminary Injunction in English and Spanish to the following entities in the following manner:

(a) Post a copy of the Preliminary Injunction in English and Spanish on a prominently located area easily and customarily accessible by employees in all Delano Farms job sites; and

(b) Distribute a copy of the Preliminary Injunction to each of Defendants' officers, directors, managers, supervisors, and agents at their place of business or home.

DATED: August 26, 2010

**WASSERMAN, COMDEN,
CASSELMAN & ESENSTEN. L.L.P.**

Bv: /s/ JESSICA ARCINIEGA
JESSICA ARCINIEGA
Attorneys for Plaintiffs, SABAS ARREDONDO,
et. al.

DATED: August 26, 2010

**GRISWOLD, LaSALLE, COBB, DOWD &
GIN. LLP**

Bv: /s/ MICHAEL R. JOHNSON
MICHAEL R. JOHNSON
Attorneys for Defendants, DELANO FARMS
COMPANY. et. al.

IT IS SO ORDERED: (1) A preliminary injunction is to remain in place throughout the duration of the litigation of this case; and (2) the terms of the preliminary injunction are as follows:

(i) Delano Farms Company, Cal Pacific Farm Management, L.P., and T&R Bangi's Agricultural Services, Inc., (hereinafter collectively referred to as "Defendants") and their supervisors, including, but not limited to, Manuel Guzman, as well as officers, agents, managers and employees of Defendants, and any other persons in active concert with Defendants be, and hereby are enjoined and restrained from engaging in or performing the following:

(a) taking any retaliatory measures or other adverse actions based on retaliatory intent affecting identified plaintiffs, identified and/or reasonably known putative class members, and identified and/or reasonably known potential witnesses, in *Arredondo, et. al. v. Delano Farms Company, et. al.*;

(b) taking any action calculated to discourage current or past employees of Defendants from free and open association with any identified plaintiff, identified and/or reasonably known putative class member, or identified and/or reasonably known potential witness in *Arredondo, et. al. v. Delano Farms Company, et. al.*;

(c) discharging, firing, terminating, suspending, failing to pay, disciplining or taking any other similar adverse action which has the anticipated or intended effect of precluding or discouraging any current employee of Defendants from testifying, assisting or participating in any proceeding, hearing or investigation in this action, provided, however, that nothing in this preliminary injunction shall prevent Defendants from making normal and customary hiring and firing decisions in the normal course of business.

IT IS FURTHER ORDERED that Defendants shall post, distribute and deliver a copy of this Preliminary Injunction in English and Spanish to the following entities in the following manner:

(a) Post a copy of the Preliminary Injunction in English and Spanish on a prominently located area easily and customarily accessible by employees in all Delano Farms job sites; and

(b) Distribute a copy of the Preliminary Injunction to each of Defendants' officers, directors, managers, supervisors, and agents at their place of business or home.

IT IS SO ORDERED.

Dated: August 27, 2010

/s/ Lawrence J. O'Neill _____

UNITED STATES DISTRICT JUDGE