

1 **WANGER JONES HELSLEY PC**

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6 Attorneys for Defendant HARRIS FARMS, INC.

7 **UNITED STATES DISTRICT COURT**
8 **EASTERN DISTRICT OF CALIFORNIA**
9 **FRESNO DIVISION**

10
11 JOSE GONZALEZ, on behalf of himself and
all others similarly situated,

12 Plaintiffs,

13 v.
14

15 HARRIS FARMS, INC., a California
corporation; and DOES 2 through 10,
16 inclusive,

17 Defendants.

Case No. 1:14-cv-00038-LJO-SAB

**STIPULATION AND ORDER TO
CONTINUE THE FILING DEADLINE
FOR AND HEARING DATE OF THE
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

1 WHEREFORE, Plaintiff Jose Gonzalez (“Plaintiff”) and Defendant Harris Farms, Inc.
2 (“Defendant”) (together as the “Parties”), through their respective counsel of record, hereby
3 stipulate and agree as follows:

4 WHEREAS, Plaintiff and Defendant have settled the class action portion of the suit, but
5 not the third party complaint, subject to the Court’s approval of the class action settlement;

6 WHEREAS, the Court tentatively approved the Settlement Agreement and set a deadline
7 for the Motion for Final Settlement Approval scheduled for July 22, 2015, at 10:00 a.m. before
8 Magistrate Judge Stanley A. Boone;

9 WHEREAS, due to the need to satisfy all Class Action Fairness Act (“CAFA”) notice
10 requirements pursuant to 28 U.S.C. §§ 1711-1715, the parties would like to request a brief
11 continuance of the deadline for the Motion for Final Approval of Class Action Settlement to be
12 filed from July 8, 2015 to August 5, 2015; and a continuance of the hearing on the Motion for
13 Final Approval of Class Action Settlement from July 22, 2015 to August 19, 2015, at 10:00 a.m.;

14 WHEREAS, Defendant’s counsel had a delay in providing the CAFA notice and thus the
15 parties need to continue the hearing for final settlement approval;

16 WHEREAS, counsel for the parties met and conferred and agreed to continue the hearing
17 date on the Motion for Final Approval of Class Action Settlement to allow for the required notice
18 under CAFA.

19 **BASED ON THE FOREGOING, IT IS HEREBY STIPULATED** as follows:

- 20 1. The deadline for filing the Motion for Final Approval of Class Action Settlement
21 shall be continued from July 8, 2015 to August 5, 2015; and
- 22 2. The hearing on the Motion for Final Approval of Class Action Settlement shall be
23 continued from July 22, 2015 to August 19, 2015, at 10:00 a.m.

24 **IT IS SO STIPULATED.**

DATED: May 12, 2015.

WANGER JONES HELSLEY PC

By: /s/ Jay A. Christofferson

Oliver W. Wanger
Jay A. Christofferson
Attorneys for Defendant HARRIS FARMS,
INC.

1 DATED: May 12, 2015.

GAINES AND GAINES, APLC

2
3 By: /s/ Daniel F. Gaines

Daniel F. Gaines

4 Attorneys for Plaintiff JOSE GONZALEZ

5 **ORDER**

6 Pursuant to the above Stipulation between the Parties, and for good cause appearing, the
7 Court hereby ORDERS as follows:

8 The Parties' stipulations as set forth above are accepted and approved by the Court:

9 1. The deadline for the filing of the Motion for Final Approval of Class Action
10 Settlement shall be continued from July 8, 2015 to August 5, 2015; and

11 2. The hearing on the Motion for Preliminary Approval of Class Action Settlement
12 shall be continued from July 22, 2015 to August 19, 2015, at 10:00 a.m.

13 IT IS SO ORDERED.

14 Dated: May 12, 2015



15 UNITED STATES MAGISTRATE JUDGE