

1 DOUGLAS J. FARMER, Cal. Bar No. 139646
douglas.farmer@ogletreedeakins.com
2 CHRISTOPHER M. AHEARN, Cal. Bar No. 239089
chris.ahearn@ogletreedeakins.com
3 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
Steuart Tower, Suite 1300
4 One Market Plaza
San Francisco, CA 94105
5 Telephone: 415.442.4810
Facsimile: 415.442.4870
6

Attorneys for Defendant
7 KRAFT FOODS GROUP, INC.

8 R. DUANE WESTRUP (State Bar No. 58610)
jveloff@westrupassociates.com
9 CAT N. BULAON (State Bar No. 206612)
cbulaon@westrupassociates.com
10 WESTRUP & ASSOCIATES
444 West Ocean Boulevard, Suite 1614
11 Long Beach, California 90802-4524
Telephone: 562.432.2551
12 Facsimile: 562.435.4856

13 Attorneys for Plaintiff
JOSE RODRIGUEZ
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15 UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF CALIFORNIA
17 FRESNO DIVISION

18 JOSE RODRIGUEZ, on behalf of himself and
19 all others similarly situated,

20 Plaintiff,

21 vs.

22 KRAFT FOODS GROUP, INC., a Virginia
23 corporation; and DOES 1 through 100, inclusive,

24 Defendant.

Case No. 1:14-CV-01137-LJO-GSA

**STIPULATION AND ORDER RE: THE
FILING OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

1 Plaintiff Jose Rodriguez and Defendant Kraft Heinz Food Company, formerly Kraft Foods
2 Group, Inc. (collectively, the “Parties”) respectfully submit this Stipulation and Proposed Order
3 Re: Filing of Plaintiff’s Motion for Preliminary Approval. The Parties jointly and respectfully
4 request that the Court grant the relief sought by this Stipulation.

5 WHEREAS, on October 22, 2015, the Court issued a minute order vacating all hearings and
6 other dates in this matter pending the filing of Plaintiff’s Motion for Preliminary Approval. [Dkt.
7 32]

8 WHEREAS, in the same order, the Court ordered that Plaintiff file his Motion for
9 Preliminary Approval on or before October 30, 2015.

10 WHEREAS, counsel for Plaintiff and Defendant are in the process of finalizing the
11 settlement agreement, expect to obtain signatures from their clients within the next few days, and
12 thus request that the Court extend the filing deadline from October 30, 2015, to November 4, 2015.

13 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties that
14 the current filing deadline in this matter should be continued, as follows:

15 (1) Plaintiff shall file his Motion for Preliminary Approval on or before November 4, 2015.

16 DATED: October 29, 2015

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

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20 By: /s/ Christopher M. Ahearn
DOUGLAS J. FARMER
CHRISTOPHER M. AHEARN
Attorneys for Defendant
KRAFT HEINZ FOOD COMPANY,
FORMERLY KRAFT FOODS GROUP,
INC.

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23 DATED: October 29, 2015

WESTRUP & ASSOCIATES

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26 By: /s/ Cat N. Bulaon
CAT N. BULAON
Attorneys for Plaintiff
JOSE RODRIGUEZ

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ORDER

Based on a review of the above stipulation and good cause appearing therein, the Court grants Plaintiff an extension to file his Motion for Preliminary Approval of Class Action Settlement. Plaintiff shall file his Motion for Preliminary Approval on or before November 4, 2015.

IT IS SO ORDERED.

Dated: October 30, 2015

/s/ Eric P. Gray
UNITED STATES MAGISTRATE JUDGE