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WEATHERFORD U.S. and WEATHERFORD ARTIFICIAL
11 LIFT SYSTEMS, LLC
12 *(Additional Counsel listed on next page)*

13 UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF CALIFORNIA

15
16 STEPHANIE A. VEGA and MICHAEL D.
McNATT, as an individuals, and on behalf
17 of all others similarly situated,
18 Plaintiff,
19 vs.

20 WEATHERFORD U.S., LIMITED
PARTNERSHIP, a Louisiana limited
21 partnership; WEATHERFORD
ARTIFICIAL LIFT SYSTEMS, LLC, a
22 Delaware limited liability company; and
DOES 3 through 10,
23 Defendants.
24

CASE NO. 1:14-CV-01790 JLT
**JOINT STIPULATION AND ORDER
REGARDING NOTICE TO FLSA AND
CALIFORNIA CLASS MEMBERS
FOLLOWING PRELIMINARY
APPROVAL OF SETTLEMENT**

(Doc. 78)

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11 Attorneys for Plaintiffs
STEPHANIE A. VEGA and MICHAEL D. McNATT
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1 IT IS HEREBY STIPULATED by and between Plaintiffs STEPHANIE VEGA and
2 MICHAEL McNATT (“Plaintiffs”) and Defendants WEATHERFORD U.S. AND
3 WEATHERFORD ARTIFICIAL LIFT SYSTEMS, LLC (collectively “Defendants”) (collectively,
4 “the Parties”), by and through their attorneys of record:

5 WHEREAS, on July 22, 2016, this Court preliminary approved settlement in the above
6 captioned matter, and thereafter, on August 2, 2016, approved the notice and exclusion forms to be
7 sent to putative class members (CA) and FLSA collective action members (Docket Nos. 71 and 77);

8 WHEREAS, in preparation for mailing, the parties noticed an error on one of the notice
9 forms. Specifically, the notice directed to those employees and former employees who are members
10 of both classes (the California settlement class and the FLSA settlement class), incorrectly refers to
11 an exclusion form rather than providing instructions on how the FLSA collective action member
12 should exclude him or herself from further participation in the lawsuit. The parties have met and
13 conferred and agree that this language could cause confusion among these FLSA collective action
14 settlement class members who have already consented to join the FLSA action;

15 WHEREAS, the parties have further met and conferred and agree that the language of the
16 notice to this group of settlement class members should be modified as identified in Exhibit A
17 attached hereto and filed herewith (note that both redlined and clean copies have been filed with the
18 court as Exhibit A).

19 NOW, THEREFORE, the Parties stipulate and respectfully request the Court issue an Order
20 approving the revised notice form with the changes identified in Exhibit A.

21 IT IS SO STIPULATED.
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1 DATED: August 4, 2016

2 /s/ Kyle W. Nageotte

3 MICHELLE B. HEVERLY
4 KARIN M. COGBILL
5 ROBERT W. PRITCHARD
6 KYLE W. NAGEOTTE
7 LITTLER MENDELSON, P.C.

8 Attorneys for Defendants
9 WEATHERFORD U.S. and WEATHERFORD
10 ARTIFICIAL LIFT SYSTEMS, LLC

11 DATED: August 3, 2016

12 /s/ Hernaldo Baltodano (as authorized on 6/3/16)

13 HERNALDO JOSE BALTODANO
14 ERICA FLORES BALTODANO
15 BALTODANO & BALTODANO LLP

16 /s/ Paul K. Haines (as authorized on 6/3/16)

17 PAUL K. HAINES
18 FLETCHER W. SCHMIDT
19 HAINES LAW GROUP, APC

20 Attorneys for Plaintiffs
21 STEPHANIE A. VEGA and MICHAEL D.
22 McNATT

23 **[PROPOSED] ORDER**

24 Having reviewed the Parties' Joint Stipulation, it is hereby ORDERED:

25 The revisions to the Notice to employees and former employees who are part of both
26 the California Settlement Class and the FLSA Settlement Class are **APPROVED**.

27 IT IS SO ORDERED.

28 Dated: August 4, 2016

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE