

1 STAN S. MALLISON (Bar No. 184191)
StanM@TheMMLawFirm.com
2 HECTOR R. MARTINEZ (Bar No. 206336)
HectorM@TheMMLawFirm.com
3 MARCO A. PALAU (Bar. No. 242340)
MPalau@TheMMLawFirm.com
4 JOSEPH D. SUTTON (Bar No. 269951)
JSutton@TheMMLawFirm.com
5 ERIC S. TRABUCCO (Bar No. 295473)
ETrabucco@TheMMLawFirm.com
6 MALLISON & MARTINEZ
1939 Harrison Street, Suite 730
Oakland, California 94612-3547
7 Telephone: (510) 832-9999
Facsimile: (510) 832-1101
8

9 MARIO MARTÍNEZ, (Bar No. 200721)
MARTÍNEZ AGUILASOCHO & LYNCH, APLC
P.O. Box 11208
10 Bakersfield, California. 93389-1208
Telephone: (661) 859-1174
11 Facsimile: (661) 840-6154

12 Attorneys for Plaintiffs

13 ANTHONY P. RAIMONDO, Bar No. 200387
RAIMONDO & ASSOCIATES
14 7080 N. Marks Avenue, Suite 117
Fresno, CA 93711
15 Telephone: 559.432.3000
16 Fax No.: 559.432.2242

17 **UNITED STATES DISTRICT COURT**
18 **EASTERN DISTRICT OF CALIFORNIA**

19 Plaintiffs SANDRA GARYBO and AGUSTIN
VEGA, on behalf of themselves and all others
20 similarly situated,

21 Plaintiffs,

22 vs.

23 LEONARDO BROS., form unknown, GOLDEN
WEST LABOR, form unknown, and DOES 1
24 through 20, inclusive,

25 Defendants.
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Case No. 1:15-cv-01487—JLT

**Stipulation to Continue Class Certification
Schedule; [~~Proposed~~] Order
(Doc. 46)**

1 Plaintiffs and Defendant Golden West Labor, through their respective counsel of record,
2 submit this Stipulation and Proposed Order to continue the class certification briefing schedule.

3 Plaintiffs and Defendant Golden West Labor continue to make progress in their settlement
4 discussions and are currently memorializing tentative settlement terms in a formal settlement
5 agreement. While the parties expect a full settlement to be reached in the near term, Plaintiffs and
6 Defendant Golden West believe that the resources of the parties would be best served by a
7 continuance of the existing class certification schedule to allow Plaintiffs and Defendant Golden
8 West Labor to finalize the settlement agreement, as opposed to Plaintiffs preparing their class
9 certification motion, which is currently due on October 20, 2017.

10 Therefore, it is hereby stipulated and agreed between the parties, and their respective
11 counsel of record, as follows:

- 12 • Plaintiffs must file their Motion for Class Certification no later than January 5, 2018;
- 13 • Defendants must file any Opposition to Class Certification no later than January 26, 2018;
- 14 • Plaintiffs must file their Reply brief no later than February 7, 2018; and
- 15 • Plaintiffs' Class Certification hearing will be heard on February 16, 2018.

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17 Accordingly, the foregoing is hereby stipulated and agreed to by and among the
18 undersigned on behalf of their respective counsel.

19
20 Dated: October 4, 2017

MALLISON & MARTINEZ

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22 By: /s/ Joseph D. Sutton
23 Stan S. Mallison
24 Hector R. Martinez
25 Marco A. Palau
26 Joseph D. Sutton
27 Attorneys for Plaintiffs

1 Dated: October 4, 2017

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/s/ Anthony P. Raimondo
ANTHONY P. RAIMONDO
RAIMONDO & ASSOCIATES
Attorneys for Defendant
B & A INTERNATIONAL FARM LABOR
SERVICES, INC.

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[PROPOSED] ORDER

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PURSUANT TO THE STIPULATION OF THE PARTIES, DECLARATION OF

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COUNSEL, AND FOR GOOD CAUSE APPEARING, THE COURT HEREBY ORDERS:

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- Plaintiffs must file their Motion for Class Certification no later than January 5, 2018;
- Defendants must file any Opposition to Class Certification no later than January 26, 2018;
- Plaintiffs must file their Reply brief no later than February 7, 2018; and
- Plaintiffs' Class Certification hearing will be heard on February 16, 2018.

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No further extensions of time will be granted related to the motion for class certification.

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The parties are encouraged expeditiously to settle or recognize settlement is not possible.

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IT IS SO ORDERED.

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Dated: October 4, 2017

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/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE

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