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12 Attorneys for Defendant  
 SHERIFF DONNY YOUNGBLOOD

14 UNITED STATES DISTRICT COURT  
 15 EASTERN DISTRICT OF CALIFORNIA

16 DARREN WONDERLY, individually and  
 on behalf of those similarly situated,

17 Plaintiff,

18 v.

19 SHERIFF DONNY YOUNGBLOOD AND  
 20 DOES 1 through 50,

21 Defendants.

CASE NO. 1:16-cv-01621-JLT

**JOINT STIPULATION TO EXTEND  
 DEADLINE TO FILE MOTION FOR  
 APPROVAL OF FLSA SETTLEMENT;  
 [PROPOSED] ORDER**  
 (Doc. 110)

23 The parties to the above-captioned action, by and through their attorneys of record, hereby  
 24 enter into the below stipulation with regard to the following facts and circumstances:

25 WHEREAS, Plaintiff DARREN WONDERLY (“Plaintiff”) filed a complaint against  
 26 Defendant SHERIFF DONNY YOUNGBLOOD (“Defendant”) on or about October 26, 2016.

27 WHEREAS, Plaintiff and Defendant SHERIFF DONNY YOUNGBLOOD (“Defendant”)  
 28 are finalizing a Settlement Agreement to be presented to the Court for approval.

1 WHEREAS, the Parties have further agreed to consolidate this matter with the  
2 related action (ECF Dkt. No. 25), *Mark Ashley v. Donny Youngblood, et al.*, USDC Case  
3 No. 16-cv-01638-JLT for settlement purposes only and in order to present a single motion for  
4 approval of settlement to the Court for approval. The consolidated case will be this matter,  
5 USDC Case No. 1:16-cv-01621-JLT.

6 WHEREAS, on November 5, 2021, pursuant to a Stipulation by and between the Parties,  
7 the Court ordered the Motion for Settlement Approval to be filed by December 10, 2021.

8 WHEREAS, the Parties require additional time to finalize the Motion for Approval of  
9 Settlement in order to update the distribution calculations and finalize review by all Parties.

10 THEREFORE, the Parties agree and request the Court extend the deadline to file the  
11 Motion for Approval of the Settlement to December 21, 2021.

12 IT IS STIPULATED THAT

13 1. The deadline to file the Motion for Approval of the Settlement be extended to  
14 December 21, 2021.

15 2. Nothing in this Stipulation and Order is intended to limit or waive any rights the  
16 parties may have.

17  
18 IT IS SO STIPULATED.

19  
20 Dated: December 9, 2021

MAHONEY LAW GROUP, APC

21 By: /s/ Katherine J. Odenbreit [authorized on 12.09.21]  
KATHERINE J. ODENBREIT

22 Attorneys for Plaintiff  
DARREN WONDERLY

23  
24 Dated: December 9, 2021

JACKSON LEWIS P.C.

25 By: /s/ Nathan W. Austin  
NATHAN W. AUSTIN  
26 EVAN D. BEECHER

27 Attorneys for Defendant  
SHERIFF DONNY YOUNGBLOOD  
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**[PROPOSED] ORDER<sup>1</sup>**

The Court, having considered the foregoing stipulation of the parties, and good cause otherwise appearing therefor, makes the following order:

IT IS ORDERED THAT:

1. This matter is consolidated for purposes of settlement only with the related matter *Mark Ashley v. Donny Youngblood, et al.*, USDC Case No. 1:16-cv-01638-JLT. The consolidated case will be this matter, USDC Case No. 1:16-cv-01621-JLT.

2. The Parties are to submit their motion for approval of the settlement and Joint Stipulation of Settlement no later than December 21, 2021.

IT IS SO ORDERED.

Dated: December 13, 2021

/s/ Jennifer L. Thurston  
CHIEF UNITED STATES MAGISTRATE JUDGE

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<sup>1</sup> Though the parties agree this case should be consolidated with the Ashely matter (Case No.: 1:16-cv-01638 JLT) for purposes of settlement, they provide no explanation of the legal basis to consolidate the cases. Indeed, the factual bases for the claims raised in the cases are different, the claims are different, and the putative members of the collective actions are different.

Notably, the proposed order does not include any language about the request to consolidate the matters. Presumably, if the parties have a legal basis for consolidation, they will present this in a future filing.