



PETER R. DION-KINDEM (SBN 95267)
 THE DION-KINDEM LAW FIRM
 PETER R. DION-KINDEM, P. C.

2945 Townsgate Road, Suite 200
 Westlake Village, CA 91361
 Telephone: (818) 883-4900
 Fax: (818) 338-2533
 Email: peter@dion-kindemlaw.com

LONNIE C. BLANCHARD, III (SBN 93530)
 THE BLANCHARD LAW GROUP, APC
 3579 East Foothill Blvd., No. 338
 Pasadena, CA 91107
 Telephone: (213) 599-8255
 Fax: (213) 402-3949
 Email: lonnieblanchard@gmail.com

Attorneys for Plaintiff Jose Gonzalez

[Additional attorneys listed on following page]

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

Jose Gonzalez, an individual, on behalf of himself
 and all others similarly situated,

Plaintiff,

vs.

CoreCivic of Tennessee, LLC (formerly CCA of
 Tennessee, LLC), and Does 1 through 10,
 inclusive,

Defendants.

Case No. 1:16-cv-01891-DAD-JLT

**Stipulation to Continue the Filing Date of
 Plaintiff's Unopposed Motion for
 Preliminary Approval of Class Action
 Settlement from May 13, 2019 to June 14,
 2019 and [Proposed] Order**

1 Todd M. Friedman (SBN 216752)
2 Adrian R. Bacon (SBN 280332)
3 LAW OFFICES OF TODD M. FRIEDMAN
4 21550 Oxnard Street, Suite 780
5 Woodland Hills, California 91367
6 Telephone: (877) 206-4741
7 Facsimile: (866) 633-0228
8 tfriedman@toddfllaw.com
9 abacon@toddfllaw.com

10 Attorneys for Plaintiff Thomas Richards

11 PAUL M. GLEASON State Bar No.: 155569
12 TOREY FAVAROTE State Bar No.: 198521
13 4014 Long Beach Blvd., Suite 300
14 Long Beach, California 90807
15 Telephone: (562) 548-6700
16 Facsimile: (562) 216-8495
17 pgleason@gleasonfavarote.com
18 tfavarote@gleasonfavarote.com

19 Attorneys for Defendant
20 CoreCivic of Tennessee, LLC (formerly
21 CCA of Tennessee, LLC)
22
23
24
25
26
27
28

1 The parties to above-captioned matter, by and through their respective attorneys of record,
2 hereby stipulate and agree as follows:

3 WHEREAS, on November 30, 2018, the parties agreed to settle this matter on terms that are
4 different than those the Court previously refused to accept; and

5 WHEREAS, because the end of the class period agreed upon by the parties is February 28,
6 2019, the parties could not obtain complete payroll and time keeping data for currently employed class
7 members until after that date; and

8 WHEREAS, on January 22, 2019, the Court ordered the unopposed motion for preliminary
9 approval of class action settlement to be filed no later than March 29, 2019;

10 WHEREAS, on March 27, 2019, based on a stipulation submitted by the parties, the Court
11 continued the deadline for plaintiff to file the motion for preliminary approval to April 29, 2019; and

12 WHEREAS, since March 27, 2019, Defendant has continued to work diligently to compile time
13 keeping data through February 28, 2019; and

14 WHEREAS, compiling the time-keeping data in an electronic format that can be produced to
15 counsel for Plaintiff has taken longer than anticipated because the electronic time records are contained
16 in individual spreadsheets for approximately 1200 individuals, which increased the amount of time it
17 took for Defendant to generate the electronic time records as well as the time it has taken for counsel
18 for Defendant to review the electronic time records and to format the time records so they can be
19 produced to Plaintiff's counsel by removing the employee name on each time record and replacing it
20 with a DOE designation; and

21 WHEREAS, counsel for Defendant is now in possession of all the of the electronic time records
22 and has produced them to Plaintiff's counsel on April 29, 2019; and

23 WHEREAS, the time keeping data is necessary for Plaintiffs' counsel to prepare the unopposed
24 motion for preliminary approval of class action settlement; and

25 WHEREAS, the sheer volume of the data within the excel sheets has taken longer than
26 expected to combine and analyze; and

1 WHEREAS, the parties agree that it is in each of their best interest to continue the current
2 deadline for Plaintiffs to file their unopposed motion for preliminary approval of class action settlement
3 to allow Plaintiffs to analyze the newly-produced data.
4

5 **NOW THEREFORE, THE PARTIES STIPULATE** and agree that good cause exists to
6 continue the deadline for Plaintiffs to file their unopposed motion for preliminary approval of class
7 action settlement to June 14, 2019.

8 Dated: May 8, 2019

THE DION-KINDEM LAW FIRM

9
10 BY: /S/ PETER R. DION-KINDEM
11 PETER R. DION-KINDEM, P.C.
12 PETER R. DION-KINDEM
13 Attorney for Plaintiff Jose Gonzalez

14 Dated: May 8, 2019

GLEASON & FAVAROTE LLP

15 BY: /S/ PAUL M. GLEASON
16 PAUL M. GLEASON
17 TOREY JOSEPH FAVAROTE
18 Attorneys for Defendant CoreCivic, Inc. formerly
19 known as Corrections Corporation of America
20
21
22
23
24
25
26
27
28

1
2 **ORDER**

3 Having reviewed the above Stipulation to Continue the Filing Date of Plaintiff's Unopposed
4 Motion for Preliminary Approval of Class Action Settlement and finding good cause for the relief
5 requested therein, the Court orders that the deadline for Plaintiffs to file their unopposed motion for
6 preliminary approval of class action settlement is hereby continued to **July 15, 2019**.

7 **The Court does not anticipate again extending this deadline.**

8 IT IS SO ORDERED.

9 Dated: **May 10, 2019**

10 **/s/ Jennifer L. Thurston**
11 UNITED STATES MAGISTRATE JUDGE