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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

AMANDA WAGNER and HEATHER LIND,)	Case No. 1:17-cv-00969-DAD-JLT
on behalf of themselves and all similarly)	
situated individuals,)	STIPULATION TO CONTINUE
)	MANDATORY SCHEDULING
Plaintiffs,)	CONFERENCE; ORDER THEREON
v.)	
)	
COUNTY OF INYO,)	
)	
Defendant.)	

The undersigned represent the named parties to this action and, by signing this stipulation, each and every party to this action agrees to the following:

WHEREAS, on July 20, 2017, Plaintiffs, on behalf of themselves and all similarly situated individuals, brought this action against Defendant alleging violations of the Fair Labor Standards Act (“FLSA”), 29 U.S.C. §§ 201, et seq.

WHEREAS, on July 20, 2017, the Court issued an Order Setting Mandatory Scheduling Conference in this action for October 18, 2017, and ordering the parties to file a Joint Scheduling Report on or before October 11, 2017, and further ordering the parties to conduct a Rule 26(f) conference on or before September 28, 2017 that is to include discussion of potential settlement.

WHEREAS, the parties are meeting and conferring over filing a stipulation for conditional certification of this case as a collective action pursuant to 29 U.S.C. § 216(b) and *Hoffmann-La Roche v. Sperling*, 493 U.S. 165 (1989) and facilitating notice to similarly situated

1 individuals. It is the intent of the parties, that through this stipulation, it will ensure an efficient
2 resolution of the claims alleged in this action for Plaintiffs and any other individuals that may be
3 similarly situated as well as adjudication of Defendant's liability, if any, as alleged. (See 29
4 U.S.C. § 216(b), See also *Hoffmann-La Roche v. Sperling*, 493 U.S. 165 (1989).)

5 WHEREAS, the parties agree that in order to conserve the resources of the Court, and
6 enable the parties to complete negotiation over a stipulation for conditional certification and
7 settlement discussions that may obviate the need to engage in further litigation, good cause exists
8 to continue the Mandatory Scheduling Conference, and related deadlines, for at least 60 days to
9 allow the parties to pursue their stipulation.

10 NOW, THEREFORE, IT IS HEREBY STIPULATED, by and between the parties, that:

- 11 a) The Mandatory Scheduling Conference shall be continued to, at the earliest,
12 December 18, 2017, or such date thereafter that is convenient for the Court; and
13 b) The parties' Joint Scheduling Report shall be filed no later than seven (7) days prior to
14 the rescheduled Mandatory Scheduling Conference; and
15 c) The deadline for the parties to conduct a Rule 26(f) conference shall be extended to at
16 least twenty (20) days before the rescheduled Mandatory Scheduling Conference.

17 Respectfully submitted,

18 Dated: September 27 2017

MASTAGNI HOLSTEDT, APC

19 By: /s/ Ace. T. Tate
20 DAVID E. MASTAGNI, ESQ.
21 ISAAC S. STEVENS, ESQ.
22 ACE T. TATE, ESQ.
Attorneys for Plaintiffs

23 Dated: September 27, 2017

**ATKINSON, ANDELSON, LOYA, RUUD &
ROMO**

24 By: /s/ Nate J. Kowalksi
25 NATE J. KOWLASKI, ESQ.
26 Attorneys for Defendant
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ORDER

Based on the stipulation of the parties, IT IS HEREBY ORDERED:

1. The Mandatory Scheduling Conference is continued to **December 21, 2017** at **8:45 a.m.** before the Honorable Jennifer L. Thurston, Magistrate Judge;
2. The parties' Joint Scheduling Report shall be filed no later than seven (7) days prior to the Mandatory Scheduling Conference; and
3. The parties SHALL conduct a Rule 26(f) conference no later than **November 27, 2017.**

IT IS SO ORDERED.

Dated: September 29, 2017

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE