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12 **UNITED STATES DISTRICT COURT**
13 **EASTERN DISTRICT OF CALIFORNIA**

14 THOMAS RICHARDS, individually)	CASE NO.: 1:17-cv-01094-LJO-JL
15 and on behalf of all others similarly)	Consolidated case number:
16 situated,)	1:16-cv-01891 DAD JLT
17)	
18 Plaintiff,)	Stipulation to Continue the Filing
19)	Date of Plaintiff's Unopposed
20 v.)	Motion for Preliminary Approval
21)	of Class Action Settlement from
22 CORECIVIC OF TENNESSEE, LLC,)	March 29, 2019 to July 15, 2019
23)	and [Proposed] Order
24 Defendants.)	
25 _____)	

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21 Attorneys for Defendant
22 CoreCivic of Tennessee, LLC (formerly CCA of Tennessee, LLC)

1 The parties to above-captioned matter, by and through their respective
2 attorneys of record, hereby stipulate and agree as follows:
3

4 WHEREAS, on November 30, 2018, the parties to this matter and the matter
5 entitled Jose Gonzalez vs. CoreCivic of Tennessee, LLC, Case No 1:16-cv-01891-
6 DAD-JLT (the “Gonzalez matter”), agreed to a settlement of both cases on terms
7 different from those that the Court previously refused to accept; and
8

9 WHEREAS, on May 8, 2019, the parties to the Gonzalez matter filed a
10 document entitled “Stipulation to Continue the Filing Date of Plaintiff’s
11 Unopposed Motion for Preliminary Approval of Class Action Settlement from
12 May 13, 2019 to June 14, 2019 and [Proposed] Order,” hereinafter referred to as
13 the “Stipulation,” a true and correct copy of which is attached hereto as **Exhibit A**;
14
15 and
16
17

18 WHEREAS, on May 10, 2019, this Court issued an Order granting the
19 request by the parties to the Gonzalez matter to continue the deadline for Plaintiff
20 to file his unopposed motion for preliminary approval of class action settlement
21 and extended the deadline to July 15, 2019, a true and correct copy of which is
22 attached hereto as **Exhibit B**; and
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1 WHEREAS, for the identical reasons set forth in the May 8, 2019
2
3 Stipulation in the Gonzalez matter, the parties to this matter agree that it is in each
4 of their best interest to continue the deadline for Plaintiff to file his motion for
5 preliminary approval to July 15, 2019.
6

7 **NOW THEREFORE, THE PARTIES STIPULATE** and agree that good
8 cause exists to continue the deadline for Plaintiff to file his unopposed motion for
9 preliminary approval of class action settlement to July 15, 2019.
10

11
12 Dated: May 15, 2019

Law Offices of Todd M. Friedman

14 s/Adrian R. Bacon

Adrian R. Bacon

Attorneys for Plaintiff Thomas Richards

16
17 Dated: May 15, 2019

Gleason & Favarote, LLP

18 s/Paul M. Gleason

Paul M. Gleason

Torey Joseph Favarote

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21 LLC
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