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**UNITED STATE DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

RICHARD MARTINEZ, an individual, on behalf of the State of California, as a private attorney general,

Plaintiff,

v.

E & A PROTECTIVE SERVICES-BRAVO, LLC, a Virginia Limited Liability Company, and DOES 1 to 10, inclusive,

Defendant.

CASE NO.: 1:18-cv-00658-DAD-BAM

[CLASS ACTION]

NOTICE OF SETTLEMENT & JOINT STIPULATION TO REQUEST TO VACATE ALL OUTSTANDING HEARINGS AND DEADLINES AND REQUEST TO SET A HEARING DATE FOR PRELIMINARY APPROVAL OF CLASS AND PAGA REPRESENTATIVE ACTION SETTLEMENT; ORDER

Complaint Filed: May 14, 2018

1 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD:**

2 Plaintiff Richard Martinez (“Plaintiff”) and Defendant E & A Protective Services-Bravo, LLC
3 (“Defendant”) (together referred to herein as the “Parties”), by and through their respective counsel
4 of record, hereby stipulate as follows:

5 **WHEREAS**, after a productive exchange of information, and after a full-day mediation, the
6 Parties resolved this matter on a class-wide basis, and, as such, agreed that a class should be certified
7 for the purpose of settlement alone.

8 **WHEREAS**, the Parties have already entered into a Memorandum of Understanding, which
9 sets forth the basic settlement terms, and are in the process of drafting a long-form Settlement
10 Agreement and proposed Class Notice for the Court’s review.

11 **NOW, THEREFORE**, in light of the Parties’ agreement, the Parties hereby request that: (1)
12 all hearings and deadlines be vacated; and (2) the Court schedule a forthcoming hearing on the motion
13 for preliminary approval of class and PAGA representative action settlement, at a date in March 2019.

14 **IT IS SO STIPULATED.**

15 Dated: March 6, 2019

16 Respectfully submitted,
17 MELMED LAW GROUP P.C.
18 ACKERMANN & TILAJEF, P.C.

19 /s/ Jonathan Melmed
20 Jonathan Melmed, Esq.
21 Craig J. Ackermann, Esq.
22 Attorneys for Plaintiff

23 Dated: March 6, 2019

24 Respectfully submitted,
25 LITTLER MENDELSON, P.C.

26 /s/ Christina M. Cila
27 Christina M. Cila, Esq.
28 Alecia Winfield, Esq.
Attorneys for Defendant

Local Rule Attestation

Pursuant to Local Rule 131(e) I attest that all of the signatories listed above concur in this
filing’s content and have authorized the filing of this document.

/s/ Jonathan Melmed
Jonathan Melmed, Esq.

1 **ORDER**

2 Pursuant to the parties' stipulation and notice of settlement, and for good cause appearing, all
3 hearings and deadlines currently scheduled in this action are HEREBY VACATED. Based on the
4 Court's availability, a hearing on the motion for preliminary approval of class action settlement is
5 HEREBY SET on **April 16, 2019, at 9:30 a.m. in Courtroom 5 (DAD) before District Judge Dale**
6 **A. Drozd**. If the parties will be filing a joint motion, such motion shall be filed 14 days before the
7 hearing; otherwise the parties shall follow the briefing scheduling as stated in Local Rule 230.

8
9 IT IS SO ORDERED.

10 Dated: March 11, 2019

11 /s/ Barbara A. McAuliffe
12 UNITED STATES MAGISTRATE JUDGE