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10 *Attorneys for Plaintiffs and the Class*

13
 14 UNITED STATES DISTRICT COURT
 15 FOR THE EASTERN DISTRICT OF CALIFORNIA

16 DAVID M. FRIEDMAN *et al.*,
 17 On behalf of all others similarly situated,
 18 *Plaintiffs,*
 19 v.
 20 CALIFORNIA STATE EMPLOYEES
 21 ASSOCIATION *et al.*,
 22 *Defendants.*

Case No. CIV-S-00-00101 WBS/DAD

CLASS ACTION

STIPULATION AND ORDER
 SUBMITTING THE MOTION FOR
 APPROVAL OF CLASS NOTICE OF
 PLAINTIFFS' MOTION FOR AWARD OF
 ATTORNEYS' FEES, COSTS AND
 EXPENSES ON THE RECORD

HEARING DATE: April 26, 2010

TIME: 2:00 p.m.

Courtroom of Judge William B. Shubb,
 Courtroom 5, 14th Floor, Sacramento, CA

26 Pursuant to L.R. 143 and 230(g), Plaintiffs David M. Friedman *et al.*, and Defendant
 27 California State University Employees Union, SEIU Local 2579, California State Employees
 28

1 Association,¹ and Defendant State Controller John Chiang,² by and through their undersigned
2 counsel, hereby respectfully submit the following Stipulation Submitting the Motion for
3 Approval of Class Notice of Plaintiffs' Motion for Award of Attorneys' Fees, Costs and
4 Expenses on the Record and Briefs on File:

5 1. On March 24, 2010, Plaintiffs filed their Motion for Approval of Class Notice of
6 Plaintiffs' Motion for Award of Attorneys' Fees, Costs and Expenses (Doc. No. 278) and related
7 papers (Doc. Nos. 279-280).

8 2. Both Defendants filed Statements of Non-Opposition to Plaintiffs' Motion for
9 Approval of Class Notice (Doc. Nos. 284 & 285).

10 3. Counsel for Plaintiffs and Defendants wish to submit the Motion for Approval of
11 Class Notice of Plaintiffs' Motion for Award of Attorneys' Fees, Costs and Expenses on the
12 record and without oral argument.³

13 DATED: April 16, 2010

14 Respectfully submitted,

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16 _____
17 Milton L. Chappell, Esq. (*Pro hac vice*)
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25 ¹This is the current correct name of the defendant initially sued as "Defendant California
26 State Employees Association, Local 1000, Service Employees International Union, AFL-CIO,
27 CLC."

28 ²Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, State Controller John
Chiang is automatically substituted as a defendant in this matter in place of his predecessor and
original defendant, Kathleen Connell.

³If the Court has any questions for counsel or wishes to proceed with oral argument, all
counsel request that they be permitted to attend the hearing by telephone: Milton L. Chappell at
(301) 770-3329; Jeffrey B. Demain at (415) 421-7151; Douglas J. Woods at (916) 324-4663.

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6 Fax: (916) 332-8153
7 Email: steveb@gtblaw.com
8 *Attorneys for Plaintiffs and the Class*

9 **IT IS SO STIPULATED.**

10 Dated: April 16, 2010

11 /s/ Jeffrey B. Demain (as authorized on April 12,
12 2010)

13 Nancy T. Yamada (State Bar No. 155155)
14 California State University Employees Union
15 SEIU Local 2579, California State Employees Association
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28 *Attorneys for Defendant California State University
Employees Union, SEIU Local 2579, California State
Employees Association*

Dated: April 16, 2010

Edmund G. Brown, Jr.
Attorney General of California

/s/ Douglas J. Woods (as authorized on April 13, 2010)

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Supervising Deputy Attorney General
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*Attorneys for Defendant John Chiang,
Controller of the State of California*

1 **IT IS SO ORDERED.**

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4 Dated: April 16, 2010

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WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

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1 **PROOF OF SERVICE**

2 I hereby certify, under penalty of perjury, that a true and correct copy of this Stipulation
3 and Order Submitting Motion to Enter Judgment was deposited in the United States Mail, first-
4 class postage pre-paid, addressed to:

5 Nancy T. Yamada
6 Cal State University Employees Union, SEIU Local 2579
7 California State Employees Association
8 1108 "O" Street, 5th Floor
9 Sacramento, CA 95814
10 *Attorney for Defendant California State University Employees Union, SEIU Local 2579,*
11 *California State Employees Association*

12 I further certify, under penalty of perjury, that I electronically filed with the Clerk of the
13 Court the foregoing Stipulation and Order Submitting Motion to Enter Judgment, using the
14 CM/ECF system which will send notification of such filing to

15 Jeffrey B. Demain
16 *Attorney for Defendant California State University Employees Union, SEIU Local 2579,*
17 *California State Employees Association*

18 Douglas J. Woods
19 *Attorney for Defendant John Chiang, Controller of the State of California*

20 All of these actions were taken on the 16th day of April, 2010.

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22 _____
23 Milton L. Chappell, Esq. (*pro hac vice*)
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