1 Adam Blair Corren, SB#183067 LAW OFFICES OF CORREN & CORREN 5345 N. El Dorado, Suite 7 Stockton, Ca 95207 3 Telephone: (209) 478-2621 Facsimile: (209) 478-3038 5 Attorney for Defendant QUALITY COMMUNITIES, INC. 7 UNITED STATES DISTRICT COURT 8 FOR THE EASTERN DISTRICT OF CALIFORNIA 9 SACRAMENTO DIVISION 10 11 **PEDRO** VIRAMONTES, SAMUEL **Case No. 2:07-CV-843 FCD EFB** 12 VIRAMONTES, and GONZALO PEREZ, on behalf of a class of similarly situated STIPULATION AND ORDER TO STAY 13 **ALL CASE PROCEEDINGS** employees, 14 Plaintiffs. Judge: Honorable Frank C. Damrell Jr. 15 VS. 16 QUALITY COMMUNITIES, INC., 17 Defendant. 18 19 20 21 22 IT IS HEREBY STIPULATED by the above-captioned parties, through their respective counsel, 23 as follows: 24 1. On December 7, 2007, Plaintiffs filed a class action First Amended Complaint against the 25 Defendant for alleged wage and hour employment law violations. In February 2009, the parties filed a 26 Joint Motion To Amend Scheduling Order as "the parties [were] unable to engage in any meaningful 27 settlement discussions" because "among other things, the Defendant [had] been forced to drastically 28

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reduce its workforce and [was considering] the possibility of filing for bankruptcy." Consequently, a trial date was rescheduled for September 2010, and then on the Court's own motion, rescheduled again for March 15, 2001.

Unfortunately, the Defendant corporation is now presently in the process of being dissolved while simultaneously the Defendant corporation's shareholders are preparing to file bankruptcy petitions. Said dissolution and bankruptcy petitions are expected to be completed and filed no later than January 31, 2011.

- 2. Considering that said dissolution and bankruptcy petitions are expected to be completed and filed in the next several weeks, the parties propose that all case proceedings be stayed.
  - 3. The parties have jointly stipulated and jointly moved the Court to stay all case proceedings.

APPROVED AS TO FORM AND CONTENT:

LAW OFFICES OF CORREN and CORREN LAW OFFICES OF MALLISON & MARTINEZ

## /s/ ADAM CORREN

## /s/ STAN MALLISON

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## **ORDER**

Pursuant to the stipulation of the parties and good cause appearing therefore:

IT IS HEREBY ORDERED that in regards to the above-captioned matter, the parties joint

motion to stay all case proceedings is granted.

Dated: January 6, 2011

C. DAMRELL, JR. UNITED STATES DISTRICT JUDGE

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