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13 Attorneys for Plaintiffs

14 UNITED STATES DISTRICT COURT  
 15 EASTERN DISTRICT OF CALIFORNIA

16 SHASHI KHANNA, suing individually and as )  
 17 Successor in Interest of Amankumar Khanna, )  
 18 deceased, by and on behalf of Amankumar )  
 19 Khanna, all others similarly situated, and the )  
 20 general public, )

21 Plaintiffs )

22 v. )

23 INTER-CON SECURITY SYSTEMS, INC., a )  
 24 California Corporation D/B/A/ )  
 25 HEALTHCARE SECURITY SERVICES )  
 26 GROUP, a putative independent entity; )  
 27 ENRIQUE HERNANDEZ, JR., an individual; )  
 28 NEIL MARTAU, an individual; LANCE )  
 29 MUELLER, an individual; ROLAND A. )  
 30 HERNANDEZ, an individual; PAUL R. )  
 31 MILLER, an individual; MICHAEL P. )  
 32 MACHARG, an individual; JEANNE GERVIN, )  
 33 an individual; MICHAEL SUTKAYTIS, an )  
 34 individual; JANA FANNING, an individual; )  
 35 BRITTANY MOORE, an individual; )  
 36 CATHERINE ROSS, an individual; LINDA )  
 37 SAYAD, an individual; MARK )  
 38 CHAMBERLAIN, an individual; and JAMES )  
 39 LATHAM, an individual, )

40 Defendants. )

CASE NO. 2:09-cv-02214-KJM-GGH  
 [CLASS ACTION & COLLECTIVE ACTION]

**STIPULATION TO CONTINUE  
 DATE FOR FILING REQUEST FOR  
 APPROVAL OF SETTLEMENT  
 AGREEMENT AND DISMISSAL;  
 AND ORDER**

Date: June 3, 2011  
 Ctrm: 3  
 Judge: Kimberly J. Mueller

Proposed  
 New Date: June 17, 2011

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REQUEST FOR CONTINUANCE AND ORDER

KHANNA v. INTER-CON SECURITY  
 Case No. 2:09-cv-02214-KJM-GGH

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STIPULATION

The parties are unable to prepare and file the Request for Approval and Dismissal by the date of June 3, 2011, previously ordered by the Court.

The parties respectfully request a short continuance to June 17, 2011, to file the Request for Approval and Dismissal.

The documents and papers cannot be filed in a timely manner due to press of business of both Plaintiffs' and Defendants' respective counsel.

Both Plaintiffs and Defendants are agreeable to this short continuance. The parties have filed previously a Notice of Settlement and have settled the case. [Ct. Doc. No. 48, May 3, 2011] They have also entered in to a Letter Agreement following a successful mediation on March 8, 2011, and they are preparing a formal Settlement Agreement to be filed with the Request for Approval.

This slight delay is fair and reasonable and will not prejudice either the Plaintiffs or the Defendants. This request for a brief continuance is respectfully submitted.

**MASTAGNI, HOLSTEDT, AMICK,  
MILLER & JOHNSEN, P.C.**

Dated: June 1, 2011

By:           /s/ JEFFREY R.A. EDWARDS            
JEFFREY R.A. EDWARDS  
Attorneys for Plaintiffs

**PAUL, HASTINGS, JANOFSKY &  
WALKER, LLP**

Dated: June 1, 2011

By:           /s/ JENNIFER OH            
JENNIFER Y. OH  
Attorneys for Defendants

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**ORDER**

GOOD CAUSING APPEARING herein,

IT IS HEREBY ORDERED that the original filing date of June 3, 2011, for the Request for Approval and Dismissal is continued to June 17, 2011.

DATED: June 2, 2011.

  
UNITED STATES DISTRICT JUDGE