

1 JESSE A. CRIPPS, SBN 222285  
 jcripps@gibsondunn.com  
 2 GIBSON, DUNN & CRUTCHER LLP  
 333 South Grand Avenue  
 3 Los Angeles, CA 90071-3197  
 Telephone: 213.229.7000  
 4 Facsimile: 213.229.7520

5 Attorney for Defendant  
 TAYLOR FARMS PACIFIC, INC.

6 *[Additional counsel listed in signature block]*  
 7

8 UNITED STATES DISTRICT COURT  
 9 EASTERN DISTRICT OF CALIFORNIA  
 10 SACRAMENTO DIVISION

11 MARIA DEL CARMEN PENA, CONSUELO  
 HERNANDEZ, LETICIA SUAREZ,  
 12 ROSEMARY DAIL, and WENDELL T.  
 MORRIS, on behalf of themselves and on  
 13 behalf of all other similarly situated  
 individuals,

14 Plaintiffs,

15 v.

16 TAYLOR FARMS PACIFIC, INC., d/b/a  
 17 TAYLOR FARMS, ABEL MENDOZA, INC.,  
 MANPOWER, INC., QUALITY FARM  
 18 LABOR, INC., SLINGSHOT  
 CONNECTIONS, LLC AND DOES 1-50,  
 19 inclusive,

20 Defendants.  
 21  
 22  
 23  
 24  
 25  
 26  
 27  
 28

CASE NO. 2:13-cv-01282-KJM-AC

**STIPULATION AND ORDER TO VACATE  
 STATUS CONFERENCE**

Status Conference Date: October 3, 2019

Judge: Honorable Kimberly J. Mueller

1 The undersigned counsel, on behalf of Plaintiffs and Defendants Taylor Farms Pacific, Inc.  
2 (“Taylor Farms Pacific”), Abel Mendoza, Inc., Manpower, Inc., Quality Farm Labor, Inc., and  
3 Slingshot Connections, LLC (collectively, the “Parties”), hereby stipulate and agree as follows:

4 WHEREAS:

5 1. On April 5, 2019, Plaintiffs filed a motion for preliminary settlement approval  
6 (“Motion”) in the above-captioned action (Dkt. 287);

7 2. After a hearing held on May 31, 2019, the Court denied Plaintiffs’ Motion *without*  
8 *prejudice to renewal* in an Order dated August 23, 2019 (Dkt. 305);

9 3. As stated in the Court’s Order, Plaintiffs may renew their Motion to “adequately address  
10 the court’s remaining concerns described” in the Order, and Plaintiffs “may do so by filing a notice of  
11 renewal and reliance on prior briefing, with supplemental briefing focusing on only the issues called  
12 out by” the Order (Dkt. 305 at 9);

13 4. On September 4, 2019, the Court set a status conference for October 3, 2019 (Dkt. 306);

14 5. In light of the August 23, 2019 Order, Plaintiffs intend to file a notice of renewal for  
15 their motion for preliminary approval to adequately address the Court’s remaining concerns by no later  
16 than October 11, 2019. Accordingly, the Parties believe that a status conference would be unnecessary  
17 at this time.

18 THEREFORE, IT IS HEREBY STIPULATED by and between the Parties, through their  
19 respective counsel, that, subject to this Court’s approval, the current October 3, 2019 status conference  
20 be vacated pending Plaintiffs filing their notice of renewal for their motion for preliminary settlement  
21 approval.

22 IT IS SO STIPULATED.  
23  
24  
25  
26  
27  
28

1 Dated: September 26, 2019

Respectfully submitted,

2 PARRIS LAW FIRM

3  
4 By: /s/ John M. Bickford (as authorized on 9/25/19)

R. Rex Parris (SBN 96567)

rrparris@parrislawyers.com

5 Kitty K. Szeto (SBN 258136)

kszeto@parrislawyers.com

6 John M. Bickford (SBN 280929)

jbickford@parrislawyers.com

7 Eric N. Wilson (SBN 291815)

ewilson@parrislawyers.com

8 **PARRIS LAW FIRM**

43364 10th Street West

9 Lancaster, CA 93534

Tel: 661.949.2595 | Fax: 661.949.7524

10 *Attorney for Plaintiffs*

11 *MARIA DEL CARMEN PENA, CONSUELO*

12 *HERNANDEZ, LETICIA SUAREZ, ROSEMARY DAIL,*

13 *and WENDELL T. MORRIS*

14 GIBSON, DUNN & CRUTCHER LLP

15 By: /s/ Jesse A. Cripps

Jesse A. Cripps

16 jcripps@gibsondunn.com

17 **GIBSON, DUNN & CRUTCHER LLP**

333 South Grand Avenue

18 Los Angeles, CA 90071-3197

Tel: 213.229.7000 | Fax: 213.229.7520

19 *Attorney for Defendant*

20 *TAYLOR FARMS PACIFIC, INC.*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

MCCORMICK BARSTOW LLP

By: /s/ Wade M. Hansard (as authorized on 9/26/19)  
Wade M. Hansard (SBN 76676)  
wade.hansard@mccormickbarstow.com  
Christina C. Tillman (SBN 258627)  
christina.tillman@mccormickbarstow.com  
Laura A. Wolfe (SBN 266751)  
laura.wolfe@mccormickbarstow.com  
**MCCORMICK BARSTOW LLP**  
7647 N. Fresno Street  
Fresno, CA 93720  
Tel: 559.433.1300 | Fax: 559.433.2300

*Attorneys for Defendant*  
*ABEL MENDOZA, INC.*

LITTLER MENDELSON P.C.

By: /s/ Gregory G. Iskander (as authorized on 9/26/19)  
Gregory G. Iskander (SBN 200215)  
giskander@littler.com  
**LITTLER MENDELSON P.C.**  
1255 Treat Boulevard, Suite 600  
Walnut Creek, CA 94597  
Tel: 925.932.2468 | Fax: 925.946.9809

*Attorneys for Defendants*  
*MANPOWER, INC./CALIFORNIA PENINSULA,*  
*erroneously sued as MANPOWER, INC.*

NOLAND, HAMERLY, ETIENNE & HOSS

By: /s/ Terrence R. O'Connor (as authorized on 9/26/19)  
Terrence R. O'Connor (SBN 88004)  
toconnor@nheh.com  
**NOLAND, HAMERLY, ETIENNE & HOSS**  
333 Salinas Street  
P.O. Box 2510  
Salinas, CA 93902-2510  
Tel: 831.424.1414 | Fax: 831.424.1975

*Attorneys for Defendant*  
*QUALITY FARM LABOR, INC.*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

VENTURA ROSSI HERSEY & MULLER, LLP

By: /s/ Daniel J. Muller (as authorized on 9/26/19)  
Daniel J. Muller (SBN 193396)  
dmuller@venturarossi.com  
**VENTURA ROSSI HERSEY & MULLER, LLP**  
160 W. Santa Clara Street, Suite 1575  
San Jose, CA 95113  
Tel: 408.512.3025 | Fax: 408.512.3022

*Attorneys for Defendant*  
*SLINGSHOT CONNECTIONS, LLC*

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: September 27, 2019.

  
UNITED STATES DISTRICT JUDGE