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12

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

16 KOUROSH KENNETH HAMIDI, et al., AND)
17 THE CLASS THEY SEEK TO REPRESENT)

18 Plaintiffs,)

19 v.)

20 SERVICE EMPLOYEES INTERNATIONAL)
UNION, LOCAL 1000, et al.;)

21 Defendants.)
22

No. 2:14-cv-00319-WBS-KJN

**STIPULATION TO CONTINUE HEARING
DATE ON, AND SET BRIEFING SCHEDULE
FOR, PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION; [~~PROPOSED~~] ORDER
THEREON**

Hearing Date: September 22, 2014

Time: 2:00 p.m.

Courtroom: 5

Judge: Hon. William B. Shubb

1 TO THE COURT:

2 The parties to the above-captioned case hereby submit the following stipulation to continue the
3 hearing date on Plaintiffs’ previously-noticed motion for class certification from September 22, 2014,
4 to January 26, 2015, and to set a briefing schedule for the filing and service of the opposition and reply
5 briefs thereon.

6 WHEREAS, on August 15, 2014, Plaintiffs noticed their motion for class certification to be
7 heard on September 22, 2014;

8 WHEREAS, the parties to the above-captioned case had previously agreed that, after Plaintiffs
9 noticed that motion, the hearing on the motion would be stayed to permit Defendants to conduct
10 discovery relevant to the class certification issue, and so informed the Court in their Revised Joint
11 Status Report, Doc. No. 20 at 3:15-18; and

12 WHEREAS, the parties now wish to implement their prior agreement and to set a briefing
13 schedule for the opposition and reply on the class certification motion so that Plaintiffs will have
14 sufficient time to prepare their reply;

15 THEREFORE, the parties hereby stipulate as follows:

16 1. The hearing on Plaintiffs’ pending motion for class certification shall be continued from
17 September 22, 2014, to January 26, 2015, at 2:00 p.m.

18 2. This stipulation shall constitute sufficient notice of that continuance, so that Plaintiffs
19 need not file an amended notice of motion.

20 3. Any oppositions to Plaintiffs’ class certification motion that Defendants submit shall be
21 filed and served on or before January 5, 2015.

22 4. Any reply in support of Plaintiffs’ class certification motion shall be filed and served, as
23 per the Local Rules, on or before January 19, 2015.

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1 The foregoing is so stipulated and agreed between the parties to the above-captioned action, by
2 among their undersigned counsel.

3 Dated: September 3, 2014.

Respectfully submitted,

4 JEFFREY B. DEMAIN
Altshuler Berzon LLP

5 J. FELIX DE LA TORRE
6 ANNE M. GIESE
7 SEIU Local 1000

8 By: /s/ Jeffrey B. Demain
Jeffrey B. Demain

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10 Attorneys for Defendant Service Employees
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19 By: /s/ Kim Nguyen (as authorized on Sept. 2, 2014)
Kim Nguyen

20 Attorneys for Defendant John Chiang,
21 Controller of the State of California

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Stipulation to Continue Hearing Date on, and Set Briefing Schedule for, Pls' Motion for Class Cert.; [Prop.] Order
Hamidi, et al. v. SEIU Local 1000, et al., Case No. 2:14-cv-00319-WBS-KJN

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9 By: /s/W. James Young (as authorized on Sept. 2, 2014)
W. James Young

10 Attorneys for Plaintiffs and the Class They
11 Seek to Represent

12
13 **ORDER**

14 **IT IS SO ORDERED.**

15 Dated: September 5, 2014

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17 WILLIAM B. SHUBB
18 UNITED STATES DISTRICT JUDGE
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