

1 KENNETH S. GAINES, ESQ. SBN 049045
2 ken@gaineslawfirm.com
3 DANIEL F. GAINES, ESQ. SBN 251488
4 daniel@gaineslawfirm.com
5 ALEX P. KATOFSKY, ESQ. SBN 202754
6 alex@gaineslawfirm.com
GAINES & GAINES, APLC
27200 Agoura Road, Suite 101
Calabasas, CA 91301
Telephone: (818) 703-8985
Facsimile: (818) 703-8984

7 Attorneys for Plaintiff TITA RODAS, on behalf
8 of herself and all others similarly situated,
and on behalf of the general public

9 C. GRIFFITH TOWLE, State Bar No. 146401
gtowle@bzbm.com
10 SONY B. BARARI, State Bar No. 243379
sbarari@bzbm.com
11 SIMON R. GOODFELLOW, State Bar No. 246085
sgoodfellow@bzbm.com
12 BARTKO, ZANKEL, BUNZEL & MILLER
A Professional Law Corporation
13 One Embarcadero Center, Suite 800
San Francisco, California 94111
14 Telephone: (415) 956-1900
Facsimile: (415) 956-1152

15 Attorneys for Defendant
16 MONETARY MANAGEMENT
17 OF CALIFORNIA, INC.

18 **UNITED STATES DISTRICT COURT**
19 **EASTERN DISTRICT OF CALIFORNIA**

20 TITA RODAS, on behalf of herself and all
21 others similarly situated, and on behalf of the
22 general public,

23 Plaintiff,

24 v.

25 MONETARY MANAGEMENT OF
26 CALIFORNIA, INC., a Delaware corporation,
and DOES 1 through 10, inclusive,

27 Defendants.

28 Case No. 2:14-cv-01389-TLN-AC

**NOTICE OF SETTLEMENT AND
STIPULATION AND ORDER TO
VACATE ALL PENDING DATES AND
STAY THIS ACTION PENDING THE
COURT'S APPROVAL OF
SETTLEMENT**

1 Plaintiff TITA RODAS (“Plaintiff”) and Defendant MONETARY MANAGEMENT OF
2 CALIFORNIA, INC (“Defendants”) (Plaintiff and Defendant are collectively the “Parties”), by
3 and through their respective undersigned counsel, hereby stipulate and agree to vacate all pending
4 dates and stay this action pending the Court’s approval of settlement, and mutually request that the
5 Court approve and enter said Stipulation and enter an order in accordance herewith to permit
6 further settlement discussions between the Parties.

7 **STIPULATION**

8 WHEREAS, on April 15, 2015, the Parties participated in a mediation with Judge Ronald
9 M. Sabraw (Ret.) in an effort to resolve the claims in the above-captioned class and representative
10 action (the “Action”);

11 WHEREAS, the Parties have reached a settlement of the Action, subject to Court approval,
12 but require further time to finalize the long form settlement and notice form;

13 WHEREAS, pursuant to the Court’s August 14, 2014 Pretrial Scheduling Order and
14 subsequent Orders Pursuant to Stipulation following thereafter, Plaintiff’s continued deadline to
15 file her Motion for Class Certification is currently May 1, 2015 (Docket No. 19);

16 WHEREAS, because the Action has been settled, the Parties believe that their time and
17 efforts should be utilized toward finalization of the settlement documents and preparation of
18 motion for preliminary approval, rather than unnecessary law and motion.

19 IT IS THEREFORE HEREBY STIPULATED AND AGREED that the Court may enter an
20 order vacating all pending dates, specifically including but not limited to the deadline to file
21 Plaintiff’s Motion for Class Certification referenced above, and staying the case pending the
22 Court’s approval of the settlement agreement.

23 IT IS FURTHER STIPULATED AND AGREED that the Court may set a date for the
24 filing of a Motion for Preliminary Approval of Class Action Settlement and a hearing date
25 thereafter, and that the Parties respectfully request thirty (30) days to prepare that filing.

26 \\

27 \\

28 \\

1 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

2 DATED: April 23, 2015

3 BARTKO, ZANKEL, BUNZEL & MILLER
4 A Professional Law Corporation

5 By: /s/ C. Griffith Towle (as authorized on 4/17/15)

6 C. Griffith Towle
7 Attorneys for MMC
8 MONETARY MANAGEMENT
9 OF CALIFORNIA, INC.

10 DATED: April 23, 2015

11 GAINES & GAINES, APLC

12 By: /s/ Alex P. Katofsky

13 ALEX P. KATOFSKY
14 Attorneys for Plaintiff TITA RODAS, on behalf of
15 herself and all others similarly situated

16 **ORDER**

17 Pursuant to the Stipulation above, the Court orders the following:

- 18 1. The Action is stayed, pending the Court's approval of the settlement agreement.
- 19 2. All pending dates, specifically including but not limited to the deadline to file Plaintiff's Motion for Class Certification referenced above, are hereby vacated.
- 20 3. The hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement is scheduled for July 2, 2015 at 2:00 p.m. in Courtroom 2 of this Court.
- 21 4. Plaintiff shall file her Motion for Preliminary Approval of Class Action Settlement no later than June 4, 2015.

22 Dated: April 23, 2015



23
24
25
26 Troy L. Nunley
27 United States District Judge
28