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 Leggett & Platt, Incorporated
 15 and L&P Financial Services Co.

16 **UNITED STATES DISTRICT COURT**
 17 **EASTERN DISTRICT OF CALIFORNIA**

18
19 Case No. 2:15-cv-01911-JAM-EFB

20 EDGAR MORALES, SALVADOR MAGAÑA, AND
 MATTHEW BAGU on behalf of themselves, the State
 21 of California, and all other similarly situated
 individuals,

22 PLAINTIFFS,

23 v.

23 LEGGETT & PLATT INCORPORATED, a Missouri
 Corporation, L&P FINANCIAL SERVICES CO., a
 24 Delaware Corporation, and DOES 2-20, inclusive,

25
26 DEFENDANTS.
27

**STIPULATION AND ORDER TO RE-
 SET CLASS CERTIFICATION
 SCHEDULE
 (AS MODIFIED BY THE COURT)**

1 The Parties to the above-entitled action, through their respective counsel of record, submit
2 this Stipulation and Proposed Order to re-set Plaintiff's deadline to file a motion for class
3 certification. The deadline to move for class certification is presently August 8, 2016. Plaintiffs
4 seek to re-set this deadline to March 30, 2017. There is good cause for modifying the existing
5 deadline, and the need to do so is no fault of either party.

6 The Parties have diligently pursued discovery in this matter. Plaintiffs have served
7 interrogatories and document requests. The Parties are conferring over production of class member
8 records, and the availability of records in electronic format. Additionally, the parties are in the
9 process of finalizing a Protective Order. Said Protective Order is meant to ensure confidentiality
10 and of private information. The Parties anticipate that the protective order will facilitate the
11 production of class member records and Defendants have indicated that they will be producing
12 such records.

13 Plaintiffs' anticipate that the parties will continue to meet and confer over Defendants'
14 document production. Production of records and disclosure of class member contact information is
15 necessary prior to moving for class certification.

16 Based on the foregoing, the Parties have agreed to request that the Court continue the
17 deadline for Plaintiffs to file a Motion for Class Certification to March 30, 2017, and to establish
18 the following briefing schedule:

19 Opposition: April 27, 2017

20 Reply: May 18, 2017

21 Hearing: June 6, 2017 at 1:30 p.m.

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23 Respectfully submitted,

24 DATED: July 22, 2016

MALLISON & MARTINEZ

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By: /S/ Marco A. Palau
 Marco A. Palau
 Attorneys for PLAINTIFFS

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DATED: July 22, 2016

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ORDER (AS MODIFIED BY THE COURT)

For good cause appearing, the deadline for Plaintiff to file a motion for class certification under Federal Rule of Civil Procedure Rule 23, and a motion to certify a collective action under the Fair Labor Standards Act is hereby continued to March 30, 2017; Opposition shall be filed no later than April 27, 2017; Reply shall be filed no later than May 18, 2017.
Hearing on the motion is set for June 6, 2017 at 1:30 p.m.

IT IS SO ORDERED.

Dated: 7/25/2016

/s/ John A. Mendez

Hon. John A. Mendez