

1 **MALLISON & MARTINEZ**  
 Stan S. Mallison (SBN 184191)  
 2 Hector R. Martinez (SBN 206336)  
 Liliana Garcia (SBN 311396)  
 3 1939 Harrison Street, Suite 730  
 Oakland, California 94612  
 4 Telephone: 510-832-9999  
 Facsimile: 510-832-1101

5 Attorneys for Plaintiffs

6 **SHOOK, HARDY & BACON L.L.P.**  
 7 Tammy B. Webb (SBN 227593)  
 tbwebb@shb.com  
 8 One Montgomery, Suite 2700  
 San Francisco, California 94104-2828  
 9 Telephone: 415-544-1900  
 Facsimile: 415-391-0281

10 Carrie A. McAtee\*  
 11 cmcatee@shb.com  
 2555 Grand Blvd.  
 12 Kansas City, Missouri 64108  
 Telephone: 816-474-6550  
 13 Facsimile: 816-421-5547

14 \*admitted *pro hac vice*

15 Attorneys for Defendants  
 Leggett & Platt, Incorporated  
 16 and L&P Financial Services Co.

17 UNITED STATES DISTRICT COURT

18 EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

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

21 Plaintiffs, )

22 vs. )

23 )  
 24 LEGGETT & PLATT, INCORPORATED, a )  
 Missouri Corporation, L&P FINANCIAL )  
 25 SERVICES CO., a Delaware Corporation, and )  
 DOES 1 through 20, inclusive, )

26 Defendants. )

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

27 **STIPULATION AND JOINT**  
**APPLICATION FOR EXTENSION OF**  
**TIME TO FILE MOTION FOR**  
**PRELIMINARY APPROVAL OF CLASS**  
**SETTLEMENT AND ORDER**

1 Plaintiffs EDGAR MORALES, SALVADOR MAGAÑA, and MATTHEW BAGU and  
2 Defendants LEGGETT & PLATT, INCORPORATED and L&P FINANCIAL SERVICES CO., by  
3 and through their respective counsel, submit the following stipulation.

4 The parties respectfully submit this stipulation to extend the time within which Plaintiffs  
5 must file their motion for preliminary approval of the class settlement.

6 **STIPULATION**

7 The parties, through their respective counsel hereby stipulate as follows:

8 1. The parties have finalized the Settlement Agreement and Release (“Agreement”) and  
9 obtained all signatures necessary to its execution.

10 2. Counsel for Plaintiffs, Liliana Garcia, reserved a hearing date of June 18, 2019 at 1:30  
11 p.m. for the court to hear Plaintiffs’ motion for preliminary approval.

12 3. Pursuant to the terms of the Agreement, Counsel for Plaintiffs, Liliana Garcia, emailed  
13 Counsel for Defendants, Carrie McAtee, drafts of the Class Notice Packet for her review on May  
14 16, 2019.

15 4. Due to scheduling conflicts, Counsel for Defendants is not in a position to review the  
16 documents and consult with her clients prior to Plaintiffs’ deadline to file their motion for  
17 preliminary approval.

18 5. The courtroom deputy to Judge John A. Mendez informed Plaintiffs’ Counsel that the  
19 next available hearing date is July 16, 2019 at 1:30 p.m.

20 6. Counsel for Plaintiffs agree that the motion will be ready for filing no later than  
21 Friday, May 24, 2019.

22 Therefore, the parties hereby stipulate that the date for filing the motion for preliminary  
23 approval should be extended to no later than May 24, 2019 and respectfully apply to this court for  
24 an order doing so based on good cause shown.

25 **IT IS SO STIPULATED:**

26 Dated: May 21, 2019

**MALLISON & MARTINEZ**

27 By: /s/ Liliana Garcia  
28 Liliana Garcia

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

*Attorneys for Plaintiffs*

**SHOOK, HARDY & BACON L.L.P.**

By: /s/ Carrie A. McAtee

Carrie A. McAtee

*Attorneys for Defendants  
Leggett & Platt, Incorporated  
and L&P Financial Services Co.*

ORDER

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

Upon a showing of good cause, IT IS HEREBY ORDERED THAT the time for Plaintiffs to file their motion for preliminary approval is hereby extended to May 24, 2019. The hearing date and time shall remain June 18, 2019 at 1:30 p.m.

Dated: 5/21/2019

/s/ John A. Mendez  
United States District Court Judge