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7 Attorneys for Plaintiffs  
 8 CHRIS ANDREW and RICHARD MAYBERRY

9 **UNITED STATES DISTRICT COURT**  
 10 **EASTERN DISTRICT OF CALIFORNIA**

12 CHRIS ANDREW and RICHARD  
 13 MAYBERRY, suing individually and by and  
 on behalf of all others similarly situated,

14 Plaintiffs,

15 v.

16 CITY OF SACRAMENTO; NATIONWIDE  
 17 INVESTMENT SERVICES CORPORATION,  
 an Ohio Corporation; INTERNATIONAL  
 18 CITY/COUNTY MANAGERS  
 ASSOCIATION-RETIREMENT  
 19 CORPORATION, a District of Columbia  
 Company,

20 Defendants.

Case No. 2:17-cv-02266-JAM-KJN

**JOINT STIPULATION TO CONTINUE  
 DEADLINE TO FILE DISPOSITION  
 DOCUMENTS**

Hon. John A. Mendez

1 As set forth in the Court’s June 21, 2018 Minute Order (Doc. No. 28), Plaintiffs Chris  
2 Andrew and Richard Mayberry, and Defendants City of Sacramento (the “City”), Nationwide  
3 Investment Services Corporation (“Nationwide”), and International City/County Managers  
4 Association-Retirement Corporation (“ICMA RC”) (collectively, “Parties”) reached a settlement  
5 in principal during the June 21, 2018 settlement conference before Magistrate Judge Claire. Since  
6 that time, the Parties have been drafting settlement documents; however, these documents have still  
7 not yet been finalized despite the Parties’ collaborative efforts.

8 The June 21, 2018 Minute order set forth a deadline of September 26, 2018 for the Parties  
9 to file final disposition documents. On September 24, 2018, the Parties filed a stipulation  
10 requesting the deadline to file final disposition documents be extended to November 16, 2018.  
11 (Doc. No. 29). That stipulated request was granted by the Court on September 25, 2018. (Doc.  
12 No. 30). On November 15, the Parties filed a second stipulation requesting that the deadline to file  
13 final disposition documents be extended to February 22, 2019. (Doc. No. 33). The second  
14 stipulated request was granted by the Court on November 16, 2018. (Doc. No. 34). On February  
15 20, 2019, the Parties filed a third stipulation requesting that the deadline to file final disposition  
16 documents be extended to April 19, 2019. (Doc. No. 35). The third stipulated request was granted  
17 by the Court on February 21, 2019. (Doc. No. 36). On April 17, 2019, the Parties filed a fourth  
18 stipulation requesting additional time to July 19, 2019. (Doc. No. 37). That stipulation was granted  
19 by the Court on April 18, 2019. (Doc. No. 38).

20 The Parties have made significant progress and have a near final draft of their agreement,  
21 but request a limited amount of additional time to finalize the draft, get client approval, and obtain  
22 the required signatures. In addition, and critically, the Parties will need additional time after  
23 finalizing the settlement agreement to carry out certain terms of the agreement, before final  
24 disposition documents can be filed. The Parties therefore request that the deadline to file final  
25 disposition documents be extended to August 30, 2019.

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27  
28 *[signature page follows]*

1 Dated: July 18, 2019

Respectfully submitted,

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MAYER BROWN, LLP

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By: /s/ Andrew Z. Edelstein  
(as authorized 7/18/19)

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Andrew Z. Edelstein

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Attorneys for Defendant

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INTERNATIONAL CITY/COUNTY

MANAGERS ASSOCIATION-RETIREMENT

CORPORATION

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9 Dated: July 18, 2019

Respectfully submitted,

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O'MELVENY & MYERS LLP

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By: /s/ Susannah K. Howard  
(as authorized 7/18/19)

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Susannah K. Howard

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Attorneys for Defendant

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NATIONWIDE INVESTMENT SERVICES

CORPORATION

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17 Dated: July 18, 2019

Respectfully submitted,

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MASTAGNI HOLSTEDT, APC

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20

By: /s/ Isaac S. Stevens

Isaac S. Stevens

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Attorneys for Plaintiffs

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CHRIS ANDREW and RICHARD

MAYBERRY

23

24 Dated: July 18, 2019

Respectfully submitted,

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BUCHALTER

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By: /s/ Kevin T. Collins  
(as authorized 7/18/19)

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Kevin T. Collins

Attorneys for Defendant

CITY OF SACRAMENTO

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1 **IT IS SO ORDERED.** The deadline for the Parties to file final disposition documents shall be  
2 extended to August 30, 2019.

3 DATED: 7/18/19

4  
5 /s/ John A. Mendez  
6 Hon. John A. Mendez  
7 United States District Court Judge  
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