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11 Attorneys for Plaintiffs

12 CHRIS ANDREW and RICHARD MAYBERRY

13 **UNITED STATES DISTRICT COURT**

14 **EASTERN DISTRICT OF CALIFORNIA**

15 CHRIS ANDREW and RICHARD  
16 MAYBERRY, suing individually and by and  
17 on behalf of all others similarly situated,

18 Plaintiffs,

19 v.

20 CITY OF SACRAMENTO; NATIONWIDE  
21 INVESTMENT SERVICES CORPORATION,  
22 an Ohio Corporation; INTERNATIONAL  
23 CITY/COUNTY MANAGERS  
24 ASSOCIATION-RETIREMENT  
25 CORPORATION, a District of Columbia  
26 Company,

27 Defendants.

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

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

Hon. John A. Mendez

28 As set forth in the Court's June 21, 2018 Minute Order (Doc. No. 28), Plaintiffs Chris Andrew and Richard Mayberry, and Defendants City of Sacramento (the "City"), Nationwide Investment Services Corporation ("Nationwide"), and International City/County Managers Association-Retirement Corporation ("ICMA RC") (collectively, "Parties") reached a settlement in principal during the June 21, 2018 settlement conference before Magistrate Judge Claire.

The Parties recently completed and signed a final settlement agreement. However, the Parties require a short amount of additional time to carry out terms of the agreement prior to filing

1 final disposition documents. Specifically, the settlement agreement requires independent fiduciary  
2 review prior to the filing of dispositional documents. This independent fiduciary review is not yet  
3 complete. The Parties therefore request that the deadline to file final disposition documents be  
4 extended to March 4, 2020, in order to carry out certain terms of the settlement agreement.

5 The June 21, 2018 Minute Order set forth a deadline of September 26, 2018 for the Parties  
6 to file final disposition documents. On September 24, 2018, the Parties filed a stipulation  
7 requesting the deadline to file final disposition documents be extended to November 16, 2018.  
8 (Doc. No. 29). That stipulated request was granted by the Court on September 25, 2018. (Doc.  
9 No. 30). On November 15, the Parties filed a second stipulation requesting that the deadline to file  
10 final disposition documents be extended to February 22, 2019. (Doc. No. 33). The second  
11 stipulated request was granted by the Court on November 16, 2018. (Doc. No. 34). On February  
12 20, 2019, the Parties filed a third stipulation requesting that the deadline to file final disposition  
13 documents be extended to April 19, 2019. (Doc. No. 35). The third stipulated request was granted  
14 by the Court on February 21, 2019. (Doc. No. 36). On April 17, 2019, the Parties filed a fourth  
15 stipulation requesting additional time to July 19, 2019. (Doc. No. 37). That stipulation was granted  
16 by the Court on April 18, 2019. (Doc. No. 38). On July 18, 2019, the Parties filed a fifth stipulation  
17 requesting additional time to August 30, 2019. (Doc. No. 40). That stipulation was granted by the  
18 Court on July 19, 2019. (Doc. No. 41). On August 30, 2019, the Parties filed a sixth stipulation  
19 requesting additional time to October 16, 2019. (Doc. No. 42). That stipulation was granted by  
20 the Court on September 3, 2019. On October 17, 2019 the Parties filed a seventh stipulation  
21 requesting additional time to November 22, 2019. (Doc. No. 44). That stipulation was granted by  
22 the Court on October 17, 2019. (Doc. No. 45). On November 25, 2019, the Parties filed an eight  
23 stipulation requesting additional time to December 20, 2019. (Doc. No. 45.) That stipulation was  
24 granted by the Court on November 25, 2019. (Doc. No. 46.)

25  
26 *[signature page follows]*

1 Dated: December 20, 2019

Respectfully submitted,

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MAYER BROWN, LLP

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By: /s/ Andrew Z. Edelstein (as authorized  
12/20/19)

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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

8

9 Dated: December 20, 2019

Respectfully submitted,

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O'MELVENY & MYERS LLP

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By: /s/ Susannah K. Howard (as authorized  
12/20/19)

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Susannah K. Howard

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Attorneys for Defendant

NATIONWIDE INVESTMENT SERVICES

CORPORATION

15

16 Dated: December 20, 2019

Respectfully submitted,

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MASTAGNI HOLSTEDT, APC

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By: /s/ Isaac S. Stevens

19

Isaac S. Stevens

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Attorneys for Plaintiffs

CHRIS ANDREW and RICHARD

MAYBERRY

21

22 Dated: December 20, 2019

Respectfully submitted,

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BUCHALTER

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By: /s/ Kevin T. Collins (as authorized  
12/20/19)

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Kevin T. Collins

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Attorneys for Defendant

CITY OF SACRAMENTO

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**ORDER**

**IT IS SO ORDERED.** The deadline for the Parties to file final disposition documents shall be extended to March 4, 2020.

12/26/2019

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