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13 **UNITED STATES DISTRICT COURT**
 14 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

16 MIGUEL A. CRUZ and JOHN D.
 17 HANSEN, individually, and on behalf
 18 of all others similarly situated,

19 Plaintiffs,
 20 vs.

21 DOLLAR TREE STORES, INC.
 22 Defendant.

Case No.: C-07-4012 SC (*Consolidated Action*)

CLASS ACTION

**STIPULATION AND [PROPOSED] ORDER
 EXTENDING TIME FOR SUBMISSION OF
 NOTICE TO THE CLASS**

23 ROBERT RUNNINGS, individually,
 24 and on behalf of all others similarly
 25 situated,

26 Plaintiffs,
 27 vs.

28 DOLLAR TREE STORES, INC.
 Defendant.

Case No.: C-07-02050 SC (*Consolidated Action*)

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1 Representative Plaintiffs Miguel A. Cruz, John D. Hansen and Robert Runnings (“Plaintiffs”)
2 and Defendant Dollar Tree Stores, Inc. (“Defendant”) (collectively “the parties”) hereby stipulate
3 by and through their attorneys of record as follows:
4

5 WHEREAS, the Court issued an Order Granting Plaintiffs’ Amended Motion For Class
6 Certification on May 26, 2009, which instructed the parties to meet and confer in good faith
7 regarding how class members will be notified of the ruling and their participation rights in the case.

8 WHEREAS, the Court’s Order provided that the parties shall either file a Stipulation and
9 Proposed Order explaining how the class will be notified or, if they could not reach agreement,
10 submit, individually, position papers of no more than five pages addressing the problems and
11 proposed solutions.

12 WHEREAS, the Court imposed a filing deadline of twenty days from the date of its May 26,
13 2009 Order to file their position papers.

14 WHEREAS, the parties have met and conferred diligently to resolve class notice issues and
15 have successfully resolved ~~most~~ ^{many} issues initially in dispute, but continue to discuss several key issues
16 pertaining to notification procedures.

17 WHEREAS, in an attempt to reach agreement on the remaining disputed issues, the parties
18 hereby agree, and do request an additional ten days for filing the individual briefs (if such briefs
19 remain necessary), extending the deadline therefor from June 15, 2009 to June 25, 2009.
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Date: June 11, 2009

SCOTT COLE & ASSOCIATES, APC

By: Molly A. Kuehn
Molly A. Kuehn, Esq.
Attorneys for the Representative Plaintiffs
and the Plaintiff Class

Date: June 11, 2009

LITTLER MENDELSON, APC

By: Krista S. Johnson bar # 155241
Maureen McClain, Esq.
Attorneys for Defendant Dollar Tree Stores, Inc.

IT IS HEREBY ORDERED that:

The Parties' deadline to file either a Stipulation and Proposed Order explaining how the class will be notified, or to file a brief of no more than five pages addressing the problem and proposing a solution, is extended to June 25, 2009.

Dated: June 11, 2009

Hon. Samuel Conti

