

1 *COUNSEL FOR PLAINTIFFS AND PROPOSED CLASS*
2 *LISTED ON NEXT PAGE*

3 MALCOLM A. HEINICKE (State Bar No. 194174)
4 TREVOR D. DRYER (State Bar No. 247826)
5 MUNGER, TOLLES & OLSON LLP
6 560 Mission Street
7 Twenty-Seventh Floor
8 San Francisco, CA 94105-2907
9 Telephone: (415) 512-4000
10 Facsimile: (415) 512-4077
11 E-mail: Malcolm.Heinicke@mto.com

12 Attorneys for Defendants
13 WACHOVIA CORP. ET AL

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16 ROBERT CRIDER, on behalf of himself
17 and others similarly situated,

18 Plaintiff,

19 vs.

20 WACHOVIA CORPORATION, a
21 corporation, WACHOVIA MORTGAGE
22 CORPORATION, a corporation,
23 WACHOVIA COMMERCIAL
24 MORTGAGE, INC., a corporation,
25 WACHOVIA FINANCIAL SERVICES,
26 INC., WACHOVIA MORTGAGE, FSB,
27 and entity form unknown, WACHOVIA, an
28 entity form unknown, and, DOES 1 through
100 inclusive,

Defendants.

CASE NO. CV 08-04288-EMC

**STIPULATION AND PROPOSED
ORDER RE: CONTINUANCE OF
INITIAL CASE MANAGEMENT
CONFERENCE AND RELATED
DEADLINES**

The Honorable Edward M. Chen

Date: December 17, 2008
Time: 1:30 p.m.
Courtroom: C, 15h Floor

Proposed Date: March 18, 2009

1 PETER M. HART (SBN 198691)
LAW OFFICES OF PETER M. HART
2 13952 Bora Bora Way, F-320
Marina Del Rey, CA 90292
3 Telephone: (310) 478-5789
Facsimile: (509) 561-6441
4 Email: hartpeter@msn.com

5 LARRY W. LEE (SBN 228175)
DIVERSITY LAW GROUP
6 444 S. Flower Street, Suite 1370
Los Angeles, CA 90071
7 Telephone: (213) 488-6555
Facsimile: (213) 488-6554

8 KENNETH H. YOON (SBN 198443)
LAW OFFICES OF KENNETH H. YOON
9 One Wilshire Boulevard, Suite 2200
Los Angeles, CA 90017
10 Telephone: (213) 612-0988
11 Facsimile: (213) 947-1211
kyoon@yoon-law.com

12 Attorneys for Plaintiff ROBERT CRIDER and those
13 similarly situated

14 //
15 //

16
17
18
19
20
21
22
23
24
25
26
27
28

1 WHEREAS, Plaintiff Robert Crider (“Plaintiff”) brings this putative wage and
2 hour class and collective action against Defendant Wachovia Mortgage, FSB (“Defendant”) and
3 other affiliated entities (Plaintiff and Defendant shall hereinafter be referred to as the “parties”);

4 WHEREAS, the parties exchanged substantial information on the proposed class
5 and then following further discussions, mediated the case in front of David A. Rotman, Esq. on
6 October 7, 2008, and through this mediation, they reached a settlement agreement which the
7 parties will shortly be presenting to the Court for preliminary approval;

8 WHEREAS, the settlement reached by the parties will also address and result in
9 the dismissal of *Sones v. World Mortgage Co. et al.*, No. 08-04811-CRB, which is currently
10 pending before the Honorable Charles Breyer of this Court;

11 WHEREAS, in light of this settlement and the parties’ plan to present this
12 settlement for preliminary approval, they respectfully submit that a continuance of the Initial
13 Case Management Conference and the associated deadlines for ninety (90) days would conserve
14 judicial resources and avoid unnecessary expense to the parties;

15 WHEREAS, the parties respectfully request that the Court re-schedule the case-
16 management conference for a date on or after Wednesday, March 18, 2009 and continue the
17 associated case management deadlines;

18 WHEREAS, the parties have executed a term sheet outlining the terms of the
19 settlement;

20 WHEREAS, the parties plan to file their motion for preliminary approval of the
21 class settlement on or before January 9, 2008;

22 WHEREAS, the parties plan to file consents to proceed before the Honorable
23 Edward M. Chen for all purposes in this matter;

24 IT IS HEREBY STIPULATED by the parties, through their counsel of record,
25 that the Initial Case Management Conference in this matter is continued to March 18, 2009 at
26 1:30 p.m., and the associated dates are continued accordingly such that they shall precede the re-
27 scheduled Case Management Conference.
28

1 DATED: November 26, 2008

DIVERSITY LAW GROUP

2

By: /s/ Larry W. Lee
LARRY W. LEE

3

Attorneys for Plaintiff Robert Crider

4

5 DATED: November 26, 2008

MUNGER, TOLLES & OLSON LLP

6

By: /s/ Malcolm A. Heinicke
MALCOLM A. HEINICKE

7

Attorneys for Defendant World Savings, Inc.

8

9

10

11 I, Malcolm A. Heinicke, attest that I have obtained concurrence from Larry W. Lee in the filing of
12 this Stipulation And ~~[Proposed]~~ Order Re: Continuance of Initial Case Management Conference
13 and Related Deadlines. See N.D. Cal. General Order 45 § 10(B).

14

15 **GOOD CAUSE APPEARING AND PURSUANT TO STIPULATION, IT IS SO**

16 **ORDERED:**

17 The Initial Case Management Conference is continued to March 18, 2009 at 1:30 p.m., ~~or~~
18 to _____, 2009, and Joint CMC Statement due March 11, 2009.

19 The deadlines associated with the Initial Case Management Conference will track the
20 continued date.

21

Date: December 10, 2008

22

23

24

25

26

27

28

