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Attorneys for Plaintiff Angela Maciel, on behalf
 of herself and all others similarly situated

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA

15 ANGELA MACIEL, on behalf of herself and all
 others similarly situated,

16 Plaintiff,

17 v.

18 VANCE UNIFORMED PROTECTIVE
 19 SERVICES, INC., GARDA SECURITY, INC.
 and Does 1 through 50, inclusive,

20 Defendants.
 21

Case No. C09-01498 SI

**JOINT STIPULATION AND
 [PROPOSED] ORDER TO CONTINUE
 HEARING AND JOINT MOTION FOR
 PRELIMINARY APPROVAL OF
 CLASS SETTLEMENT**

22
 23 **TO THE HONORABLE COURT:**

24 **IT IS HEREBY STIPULATED AND AGREED**, by and between Plaintiff Angela
 25 Maciel, on behalf of herself and all others similarly situated (“Plaintiff” or “Class
 26 Representative”), and Defendant Garda Security Inc., formerly named Vance Uniformed
 27 Protective Services, Inc. (“Defendant” or “Garda”) (collectively, the “Parties”), by and through
 28 their respective counsel of record, as follows:

1 WHEREAS, the Hearing for Preliminary Approval of Class Settlement in this matter is
2 presently set for September 11, 2009, with the Parties' Joint Motion for Preliminary Approval due
3 to be filed on August 28, 2009; and

4 WHEREAS, Class Representative and Defendant have been engaged in complex
5 negotiation of a fair, reasonable, and adequate settlement, which will be in the best interests of the
6 class and provide substantial benefits to members of the class and the State of California (the
7 "Settlement"); and

8 WHEREAS, the Parties recently reached agreement on terms of the Settlement and
9 require additional time to obtain signatures of representatives from the appropriate corporate
10 entities authorized to execute the Settlement on behalf of Defendant; and

11 WHEREAS, the Parties contacted this Court's Clerk as soon as the need for continuance
12 arose and were advised the Court's calendar may accommodate holding the Hearing for
13 Preliminary Approval of Class Settlement on September 25, 2009;

14 **THE PARTIES THEREFORE STIPULATE AND PROPOSE AS FOLLOWS:**

15 1. The Hearing for Preliminary Approval of Class Settlement in this matter be
16 rescheduled to September 25, 2009; and

17 2. The Parties' Joint Motion for Preliminary Approval be filed on September 11,
18 2009; and

19 3. The Parties further agree that faxed signatures on this Stipulation are deemed to be

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1 original signatures for filing purposes.

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3 **IT IS SO STIPULATED.**

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5 Dated: August __, 2009

QUALLS & WORKMAN, L.L.P.

6

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By: _____

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Daniel H. Qualls
Robin G. Workman
Attorneys for Plaintiff Angela Maciel

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Dated: August 28, 2009

JACKSON LEWIS LLP

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By: _____

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JoAnna L. Brooks
Timothy C. Travelstead
Douglas M. Bria
Attorneys for Defendant
GARDA SECURITY, INC.,
formerly named
VANCE UNIFORMED
PROTECTIVE SERVICES, INC.

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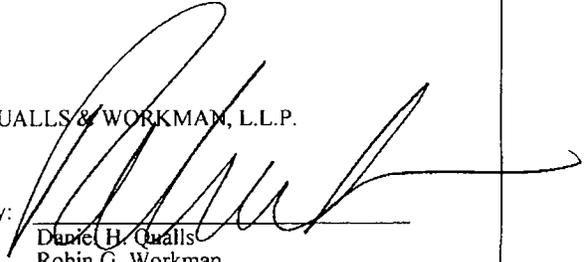
1 original signatures for filing purposes.

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3 **IT IS SO STIPULATED.**

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5 Dated: August 28, 2009

QUALLS & WORKMAN, L.L.P.

6
7 By: 
8 Daniel H. Qualls
9 Robin G. Workman
10 Attorneys for Plaintiff Angela Maciel

11 Dated: August __, 2009

JACKSON LEWIS LLP

12
13 By: _____
14 JoAnna L. Brooks
15 Timothy C. Travelstead
16 Douglas M. Bria
17 Attorneys for Defendant
18 GARDÁ SECURITY, INC.,
19 formerly named
20 VANCE UNIFORMED
21 PROTECTIVE SERVICES, INC.
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[PROPOSED] ORDER

The Court, having read and considered the Parties' Stipulation and all papers and pleadings filed by the Parties herein, and for good cause shown, rules as follows:

(1) The Hearing for Preliminary Approval of Class Settlement in this matter is continued to September 25, 2009; and

(2) The Parties' Joint Motion for Preliminary Approval shall be filed on September 11, 2009; and

(3) Faxed signatures on this Stipulation are deemed to be original signatures for filing purposes.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____



THE HONORABLE SUSAN ILLSTON
JUDGE OF THE UNITED STATES
DISTRICT COURT