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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

JUAN BONIFACIO ULIN,

Plaintiff,

vs.

LOVELL'S ANTIQUE GALLERY,
 ABRAHAM MAGIDISH, and DOES 1-10,
 inclusive.

Defendants.

CASE NO.: C 09-03160 EDL

**JOINT STIPULATION FOR
 REFERRAL TO A MAGISTRATE
 JUDGE FOR AN EARLY
 SETTLEMENT CONFERENCE;**

~~PROPOSED~~ ORDER THEREON

The parties, jointly through counsel stipulate as follows:

1. This case is a wage and hour action by the above named Plaintiff against the above-named Defendants for the recovery of unpaid overtime wages, meal period premiums and associated penalties and fees.
2. Parties have now conducted extensive discovery in this action.
3. Parties have exchanged several rounds of written discovery, conducted depositions and have several depositions which remain to be taken in the month of June.

STIPULATION FOR REFERRAL TO AN EARLY SETTLEMENT CONFERENCE

4. The results of parties discovery efforts have prompted the parties to return to the table and make another effort to settle this case without the need for trial and further litigation.
5. While the parties have agreed to make all efforts to resolve their dispute, the parties still remain sufficiently at odds with regard to Plaintiff's regular working hours that a strong neutral would be invaluable to aid parties in reaching settlement.
6. Parties do not feel they can resolve this matter without this help, and therefore, respectfully look to the Court to provide them a forum for settlement by allowing them a referral to a magistrate judge for the conduct of an Early Settlement Conference.
7. That said, parties are now more committed than ever to settlement, recognizing that a failure to settle now will likely result in trial.
8. Parties commit to making a good-faith effort to settle this matter without further litigation, which presents an undesirable amount of risk, delay and expense to both sides.
9. Therefore, the **PARTIES HEREBY STIPULATE** and respectfully request that the Court enter the proposed order attached hereto, referring this case to a settlement Conference as soon as is practicable, but preferably within the next 90 days.

LAW OFFICES OF ADAM WANG

Dated: June 3, 2010

By: /s/Adam Pedersen
ADAM PEDERSEN
Attorney for Plaintiff
JUAN BONIFACIO ULIN

STIPULATION FOR REFERRAL TO AN EARLY SETTLEMENT CONFERENCE

SHELLEY BUCHANNAN, ESQ.

Dated: June 3, 2010

By: /s/Shelley Buchanan

SHELLEY BUCHANNAN

Attorney for Defendants

ALEA-72 INC., and ABRAHAM MAGIDISH

PROPOSED ORDER

PURSUANT TO THE STIPULATION OF THE PARTIES, this Court hereby **ORDERS** that

this matter referred to ^aMagistrate Judge _____ for ^a~~an~~ Early Settlement

Conference, to be conducted as soon as is practicable within the next 90 days, if possible.

Dated: June 3, 2010 _____

By: Elijah D. Laporte
Hon. E. D. Laporte – US District Judge

STIPULATION FOR REFERRAL TO AN EARLY SETTLEMENT CONFERENCE