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Attorneys for Plaintiff NICK MARTIN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JACQUELINE DOMNITZ, PAMELA
TADDEI, AND IMELDA KANTERE, on
behalf of themselves, all others similarly
situated, and the general public,

Plaintiffs,

v.

WAREHOUSE DEMO SERVICES, INC.,
a Washington Corporation; and DOES 1
through 10, inclusive,

Defendants.

) Case No: CV-09-05305 MMC
) and Related Action
) Case No. CV-10-04539 MMC
) (*Martin v. Warehouse Demo Services, Inc.*)

**STIPULATION AND
[PROPOSED] ORDER REGARDING
REMINDER POSTCARD NOTICE TO
THE CLASS**

Ctrm: 7

STIPULATION AND [PROPOSED] ORDER
REGARDING POSTCARD NOTICE TO THE CLASS

Case No: CV-09-05305 MMC

1 WHEREAS, on April 1, 2011, the Court granted preliminary approval of a class action
2 settlement between the parties in Lead Case *Domnitz v. Warehouse Demo Services, Inc.* and
3 Consolidated Case *Martin v. Warehouse Demo Services, Inc.*

4 WHEREAS pursuant to paragraphs 9 and 10 of the April 1, 2011 order, the Court
5 approved the parties' proposed method of providing mailed, written, notice to the settlement
6 class, and found it constitutes the best notice practicable under the circumstances and sufficient
7 notice of the matters of the case. Settlement class members have until July 13, 2011, to submit a
8 postmarked claim form, objection, or request for exclusion from the settlement. Pursuant to
9 section IV.H(h) of the stipulation of settlement, the parties are otherwise prohibited from
10 contacting class members regarding their participation in or exclusion from the settlement.

11 WHEREAS the parties have conferred and wish to maximize participation by settlement
12 class members. Accordingly, the parties seek to provide additional notice to potential settlement
13 class members who have not responded to the original notice. The parties agree to mailing of a
14 postcard reminder notice to class members that have not yet submitted a claim form or request
15 for exclusion. The proposed postcard is attached hereto as Ex. A.

16 IT IS HEREBY STIPULATED, by and between Plaintiffs and Defendant by and through
17 their respective counsel, that:

- 18 1. Rust Consulting, Inc., the approved claims administrator, shall mail the reminder
19 postcard in the form attached as Ex. A to this Stipulation, or as approved by the Court, to
20 class members who have not responded to the originally-mailed notice packet as of the
21 date of this Order.
- 22 2. The cost of mailing the postcards will be covered by the approved funding for claims
23 administration, as provided in section IV.D of the stipulation and settlement and
24 addendum thereto.

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1 IT IS SO STIPULATED.

2 DATED: July 6, 2011

HOFFMAN EMPLOYMENT LAWYERS, LLP

3 /S/ Michael Hoffman

4
5 _____
6 Michael Hoffman, Esq.
7 Alec Segarich, Esq.
8 Attorneys for Plaintiffs JACQUELINE DOMNITZ
9 et al.

10 DATED: July 6, 2011

STONEBARGER LAW, APC

11 /S/ Gene Stonebarger

12 _____
13 Gene Stonebarger, Esq.
14 Attorney for Plaintiff Nick Martin

15 DATED: July 6, 2011

JACKSON LEWIS, LLP

16 /S/ JoAnna Brooks

17 _____
18 JoAnna Brooks, Esq.
19 Douglas Bria, Esq.
20 Attorneys for Defendant WDS

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ORDER

The Court having reviewed the foregoing Stipulation, and good cause appearing
therefore:

IT IS HEREBY ORDERED that:

1. Rust Consulting, Inc. shall mail the postcard to settlement class members who have not responded to the original notice mailing in this case, as of the date of this order.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: July 8, 2011

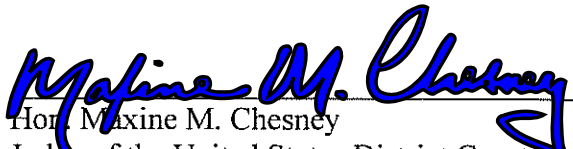

Hon. Maxine M. Chesney
Judge of the United States District Court

EXHIBIT A

IMPORTANT REMINDER FROM THE DOMNITZ V. WAREHOUSE DEMO SERVICES, INC. CLASS ACTION CLAIMS ADMINISTRATOR

Notice Materials were recently mailed to you in regard to the *Domnitz v. Warehouse Demo Services, Inc.*, Settlement.

In order to be eligible to receive any of the Settlement proceeds, you must complete, sign and mail the Claim Form, postmarked on or before **July 13, 2011** to the Class Action Claims Administrator at the address below.

DOMNITZ V. WAREHOUSE DEMO SERVICES, INC.
Class Action Claims Administrator
c/o Rust Consulting, Inc.
P.O. Box 2396
Faribault, MN 55021-9096

If you did not receive your Notice Materials or misplaced them, please call the Class Action Claims Administrator at **1-800-804-0673** to request another copy be mailed to you.

DOMNITZ V. WAREHOUSE DEMO SERVICES, INC.
CLASS ACTION CLAIMS ADMINISTRATOR
C/O RUST CONSULTING, INC.
P.O. BOX 2396
FARIBAULT, MN 55021-9096

IMPORTANT LEGAL REMINDER

«Main_RustID» - «seq»

«FIRSTNAME» «LASTNAME»
«ADDRESS1»
«ADDRESS2»
«CITY» «STATE» «ZIP»
«COUNTRY»