

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

LARRY W. LEE (State Bar No. 228175)  
**DIVERSITY LAW GROUP, A Professional Corporation**  
444 S. Flower Street  
Citigroup Center · Suite 1370  
Los Angeles, California 90071  
(213) 488-6555  
(213) 488-6554 facsimile

SHERRY JUNG (State Bar No. 234406)  
**LAW OFFICES OF SHERRY JUNG**  
444 S. Flower Street  
Citigroup Center · Suite 1370  
Los Angeles, California 90071  
(213) 488-6555  
(213) 488-6554 facsimile

Attorneys for Plaintiff Stephen Song

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

STEPHEN SONG, as an individual and on  
behalf of all others similarly situated,

Plaintiffs,  
vs.

KLM GROUP, INC. dba KLM ONSITE  
SOLUTIONS, a Pennsylvania corporation;  
and DOES 1 through 20, inclusive,

Defendants.

Case No.: 3:10-CV-03583-SC

JOINT STIPULATION RE SHORTENED  
NOTICE OF FILING OF UNOPPOSED  
MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION  
SETTLEMENT

1 Plaintiff Stephen Song (“Plaintiff” or “Song”) and Defendant KLM Group, Inc. dba KLM  
2 Onsite Solutions (“Defendant” or “KLMr”) (collectively referred to as the “Parties”) enter into  
3 this joint stipulation with reference to the following facts:

4 **RECITALS**

5 A. WHEREAS on the Parties previously reached a proposed class-wide settlement  
6 after two settlement conferences with the Hon. Laurel Beeler;

7 B. WHEREAS the Parties have now finalized the class settlement agreement and  
8 related documents;

9 C. WHEREAS the Motion for Preliminary Approval of the Class Action Settlement  
10 has previously been set for hearing to take place on May 13, 2011 [See Doc. No. 27];

11 D. WHEREAS the Parties have agreed that Plaintiff will file a Motion for  
12 Preliminary Approval of Class Settlement (“Motion for Preliminary Approval”) on or before  
13 April 22, 2011;

14 E. WHEREAS the Parties have agreed that Defendant will not file an opposition to  
15 Plaintiff’s Motion for Preliminary Approval;

16 F. WHEREAS the Parties have agreed that Plaintiff will not file a reply in support of  
17 Plaintiff’s Motion for Preliminary Approval; and

18 G. WHEREAS the Parties have agreed to request that the Plaintiff’s Motion for  
19 Preliminary Approval be filed with the Court on less than the regular notice periods pursuant to  
20 the Northern District of California’s Local Rules;

21 **STIPULATION**

22 NOW, THEREFORE, it is hereby stipulated by the parties, through their respective  
23 counsel of record, as follows:

24 1. The Plaintiff’s Motion for Preliminary Approval shall be filed on or before April  
25 22, 2011, with a hearing date of May 13, 2011;

26 2. Defendant will not file opposition to Plaintiff’s Motion for Preliminary Approval;

27 and  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

3. Plaintiff will not file a reply in support of Plaintiff's Motion for Preliminary Approval.

IT IS SO STIPULATED.

Dated: April 14, 2011

DIVERSITY LAW GROUP

By:                   /s/                    
Larry W. Lee, Esq.  
Attorneys for Plaintiff

Dated: April 14, 2011

FARELLA BRAUN & MARTEL, LLP

By:                   /s/                    
Douglas Dexter  
Attorneys for Defendants

I, Larry W. Lee, attest that I have obtained concurrence from Douglas Dexter in the filing of this Stipulation. See N.D. Cal. General Order 45 § 10(B).

# **ATTACHMENT A**

1 (Counsel for the parties listed on next page)  
2  
3  
4  
5  
6

7 UNITED STATES DISTRICT COURT  
8 NORTHERN DISTRICT OF CALIFORNIA  
9

10 STEPHEN SONG, as an individual and  
11 on behalf of all others similarly situated,

12 Plaintiff,

13 vs.

14 KLM GROUP, INC. dba KLM ONSITE  
15 SOLUTIONS, a Pennsylvania  
16 corporation; and DOES 1 through 20,  
17 inclusive,

18 Defendants.  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

No. 3:10-CV-03583-SC

**CLASS ACTION**

**[PROPOSED] ORDER GRANTING JOINT  
STIPULATION RE SHORTENED NOTICE OF  
FILING OF UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF CLASS ACTION  
SETTLEMENT**

Fed. R. Civ. P. 26(f)  
N.D. Cal. Civ. L.R. 16-9

Courtroom: 1  
Judge: Hon. Samuel Conti

1 LARRY W. LEE (Cal. State Bar No. 228175)  
DANIEL H. CHANG (Cal. State Bar No. 183803)  
2 DIVERSITY LAW GROUP, A Professional Corporation  
444 S. Flower Street  
3 Citigroup Center, Suite 1370  
Los Angeles, California 90071  
4 Telephone: (213) 488-6555  
Facsimile: (213) 488-6554  
5 E-mail: [lwlee@diversitylaw.com](mailto:lwlee@diversitylaw.com)  
E-mail: [dchang@diversitylaw.com](mailto:dchang@diversitylaw.com)

6 SHERRY JUNG (Cal. State Bar No. 234406)  
7 LAW OFFICES OF SHERRY JUNG  
444 S. Flower Street  
8 Citigroup Center, Suite 1370  
Los Angeles, California 90071  
9 Telephone: (213) 488-6555  
Facsimile: (213) 488-6554  
10 E-mail: [sherryj23@hotmail.com](mailto:sherryj23@hotmail.com)

11 Attorneys for Plaintiff Stephen Song

12 DOUG DEXTER (State Bar No. 115868)  
FARELLA BRAUN + MARTEL LLP  
13 Russ Building  
235 Montgomery St.  
14 San Francisco, CA 94104  
15 (415) 954-4400  
(415) 954-4480  
16 E-mail: [ddexter@fbm.com](mailto:ddexter@fbm.com)

17 Attorneys for Defendant KLM Group, Inc.

18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

The parties having so stipulated, and good cause appearing therefore,

IT IS ORDERED that the Plaintiff's Motion for Preliminary Approval shall be filed on or before April 22, 2011, with a hearing date of May 13, 2011;

IT IS FURTHER ORDERED that Defendant will not file opposition to Plaintiff's Motion for Preliminary Approval and Plaintiff will not file a reply in support of Plaintiff's Motion for Preliminary Approval.

Dated: April 18, 2011.

