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 AND M.Y. "MIKE" KHALAF

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA

17 RENE ANGEL, et al.,
 18 Plaintiffs,
 19 v.
 20 NORTH COAST COURIERS, INC., et al.,
 21 Defendants.

Case No. Case No. CV 11 1028 JSW

**STIPULATION RE: SETTLEMENT AND
~~PROPOSED~~ ORDER VACATING
 PRETRIAL CONFERENCE AND TRIAL
 DATES**

23 Plaintiffs Rene Angel, Marco Flores and David Martinez ("Plaintiffs") and Defendants
 24 Tanweer Ahmed and M.Y. "Mike" Khalaf ("Defendants") (collectively "the Parties"), by and
 25 through their respective counsel, hereby stipulate and agree as follows:

26 1. On February 1, 2012, this Court denied Defendants' Motion For Summary
 27 Judgment Or, In the Alternative, Summary Adjudication, and ordered the parties to return for a
 28 further settlement conference with the Honorable Magistrate Judge Laurel Beeler;

STIPULATION RE: SETTLEMENT AND
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 PRETRIAL CONFERENCE & TRIAL DATES

1 2. On January 31, 2012, Littler Mendelson, counsel to Defendants filed a Motion To
2 Withdraw as Counsel To Defendants and Request to Continue Pretrial and Trial Dates in this action,
3 which was placed on the court’s calendar for March 9, 2012;

4 3. On February 27, 2012, the Parties attended a settlement conference conducted by
5 Magistrate Beeler and there entered into a confidential settlement of the action;

6 4. On March 5, 2012, the Parties stipulated to the removal from the Court’s calendar of
7 Littler Mendelson’s Motion To Withdraw as Counsel to Defendants on grounds that the action had
8 been settled;

9 5. On March 6, 2012, the Court adopted the stipulation and ordered the removal of
10 Littler Mendelson’s motion to withdraw from the Court’s calendar;

11 6. The settlement reached on February 27, 2012, provides that the case shall be
12 dismissed and judgment entered once Defendants have performed their obligations under the
13 agreement. The parties anticipate that Defendants’ performance will be complete in February, 2013;

14 7. There are two dates that remain on the Court’s calendar. Those are the Pretrial
15 Conference on April 16, 2012, and the Trial, which is set to commence on May 7, 2012. Because the
16 settlement resolves all claims and defenses of the Parties, the parties stipulate and agree that the
17 Pretrial Conference and Trial are no longer unnecessary and respectfully request that the Court
18 vacate the Pretrial Conference and Trial dates.

19 Dated: April 10, 2012

LAW OFFICES OF VICTOR C. THUESEN

21 By: /s/ Victor C. Thuesen
Victor C. Thuesen

22 Attorneys for Plaintiffs

23 Dated: April 10, 2012

LITTLER MENDELSON

25 By: /s/ Kai-Ching Cha
Kai-Ching Cha

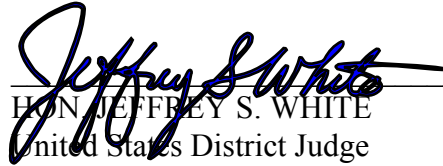
26 Attorneys for Defendants

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PROPOSED ORDER

The Court adopts the Stipulation of the Parties and hereby vacates the Pretrial Conference date of April 16, 2012 and the Trial date of May 7, 2012. The Court SETS a case management conference for March 8, 2013 at 1:130 p.m. The case management conference will be vacated if the ~~PURSUANT TO STIPULATION, IT IS SO ORDERED.~~ this action is dismissed before March 8, 2013 date. IT IS SO ORDERED.

DATED: April 11, 2012 _____



HON. JEFFREY S. WHITE
United States District Judge

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