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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GLORIA A. MORALES and ELSA
GONZALEZ,

Plaintiffs,

v.

LABORERS' UNION LOCAL 304,

Defendant.

) No. C 11-02278 WHA

) **STIPULATION AND [PROPOSED]**
) **ORDER TO CONSOLIDATE CASES**

SANDRA CARRANZA, LAURA GUZMAN
and TARA LEE RUYLE,

Plaintiffs,

v.

LABORERS' UNION LOCAL 304,

Defendant.

) No. C 11-02459 WHA

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1 The parties hereby stipulate, pursuant to Federal Rule of Civil Procedure 42 and Local Civil
2 Rules 7-11 and 7-12, that the above captioned matters should be consolidated for all purposes.

3 On June 28, 2011, this Court ordered these matters related. In addition to being related, the
4 two matters should be consolidated as they involve common questions of law and fact and avoid
5 unnecessary costs and delay. The parties agree that the five individual Plaintiffs in these matters
6 allege the same causes of action against a common Defendant. The claims of the Plaintiffs arise
7 out of common facts and occurrences, namely whether the employees worked overtime for the
8 Defendant without compensation.

9 The discovery for both cases will substantially overlap with the only differences being the
10 period of time each of the individual Plaintiffs was employed by the Defendant. As such, the only
11 differences between the two cases are the number of employees and the dates of each individual's
12 employment.

13 The complaints in the two cases are substantially similar and answer of the Defendant to
14 complaint is substantially similar. It is expected that discovery between the two cases will overlap
15 significantly and the parties agree it would avoid prejudice, expedite and economize Court's
16 resources and add convenience for these two matters consolidated.

17 Therefore, the parties request that these matters be consolidated.

18 SO STIPULATED:

19 Dated: July 19, 2011

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

20 By: 

GAREN P. SENCER
Attorneys for Defendant

21 Dated: July 18, 2011

22 NEXUS LAW GROUP 

23 By: 

JARRETT GREEN
Attorneys for Plaintiffs

24 Pursuant to stipulation, **it is so ordered.** The above-captioned cases are consolidated for all
25 purposes and Case No. 11-cv-2278 WHA will be deemed for all purposes the lead case and
26 any documents filed in Case No. 11-cv-2278 WHA will be deemed to have been filed as to
27 both cases.

28 Dated: July 21, 2011


UNITED STATES DISTRICT COURT JUDGE