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15 Attorneys for Defendant
LABORERS' UNION LOCAL 304
16

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA

19
20 GLORIA A. MORALES, ELSA
GONZALEZ, SANDRA CARRANZA,
LAURA GUZMAN and TARA LEE
21 RUYLE,

22 Plaintiffs,

23 vs.

24 LABORERS' UNION LOCAL 304,

25 Defendant.
26
27
28

Case No. 3:11-cv-02278-WHA

**STIPULATION TO EXTEND TIME
FOR PLAINTIFFS TO FILE
MOTION TO AMEND AND
PROPOSED AMENDED
COMPLAINT;**

~~PROPOSED~~ ORDER

Assigned to the Hon. William H. Alsup
for all purposes

1 **WHEREAS**, Defendant Laborers' Union Local 304 ("Defendant") filed a
2 motion pursuant to FRCP 12(b)(6) to dismiss the claims of Gloria Morales, Elsa
3 Gonzalez, Sandra Carranza, Laura Guzman and Tara Lee Ruyle ("Plaintiffs") for
4 overtime, vacation pay, accurate wage statements and waiting time penalties;

5 **WHEREAS**, on November 15, 2011, the Court granted in part and denied in
6 part the defendant's motion;

7 **WHEREAS**; the Court indicated that the Plaintiffs "may seek leave to amend
8 the complaint and will have **FOURTEEN CALENDARS DAYS** ... to file a motion ... for
9 leave to file an amended complaint;"

10 **WHEREAS**, the Court ordered that the "proposed amended complaint must be
11 appended to the motion;" and

12 **WHEREAS**, Plaintiffs' counsel is out of the office during the preceding week
13 for previously planned Thanksgiving holiday vacations with family; and

14 **WHEREAS**, the parties have agreed to extend the Plaintiff's date to file their
15 motion and proposed amended complaint by **THREE CALENDAR DAYS** to Friday,
16 December 2, 2011;

17 **NOW THEREFORE, IT IS STIPULATED** by and between the parties, by
18 their respective counsel of record, as follows:

19 The deadline for Plaintiffs to file their motion and proposed amended complaint
20 is extended from November 29, 2011 to December 2, 2011.

21 Dated: November 21, 2011

NEXUS LAW GROUP

22
23 By: 
24 _____

Jarrett A. Green

25 Attorneys for Plaintiffs
26 GLORIA A. MORALES, ELSA
27 GONZALEZ, SANDRA CARRANZA,
28 LAURA GUZMAN AND TARA LEE
RUYLE

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1 Dated: November 21, 2011

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

2
3 By: : /s/ Caren P. Sencer
Caren P. Sencer

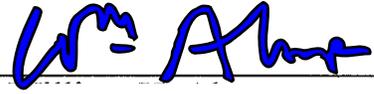
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5 Attorneys for Defendant
LABORERS' UNION LOCAL 304

6 ~~PROPOSED~~ ORDER

7 **IT IS SO ORDERED:**

- 8 1. That the deadline for Plaintiffs to file their motion and proposed amended
9 complaint is extended from November 29, 2011 to December 2, 2011.
10
11 2. Notice for the motion shall be on the normal 35-day track.

12 Dated: November 22, 2011

By: 

13 William Alsup
14 UNITED STATES DISTRICT JUDGE

14 128011/645489