

1 PETER M. HART (State Bar No. 198691)
 hartpeter@msn.com
 2 AMBER S. HEALY (State Bar No. 232730)
 ahealy.loph@gmail.com
 3 KATHERINE COPELAND (State Bar No. 281662)
 kcopeland.loph@gmail.com
 4 **LAW OFFICES OF PETER M. HART**
 12121 Wilshire Boulevard, Suite 205
 5 Los Angeles, California 90025
 Telephone: (310) 478-5789
 6 Facsimile: (509) 561-6441

7 KENNETH H. YOON (State Bar No. 198443)
 kyoonyoon@yoonyoonlaw.com
 8 **LAW OFFICES OF KENNETH H. YOON**
 One Wilshire Blvd., Suite 2200
 9 Los Angeles, CA 90017
 Telephone: (213) 612-0988
 10 Facsimile: (213) 947-1211

11 Attorneys for Plaintiff
 Vernon Michael Lambson and Dinora Martinez

12
 13 **UNITED STATES DISTRICT COURT**
 14 **NORTHERN DISTRICT OF CALIFORNIA**

15 VERNON MICHAEL LAMBSON AND DINORA
 16 MARTINEZ, as an individual and on behalf of
 others similarly situated,

17 Plaintiff,

18 v.

19 THE RITZ-CARLTON HOTEL COMPANY, LLC, a
 20 Delaware corporation;, and DOES 1 THROUGH
 100, inclusive,

21 Defendants.
 22

CASE NO.: 3:11-CV-06669-CRB

**NOTICE OF SETTLEMENT IN PRINCIPLE
 AND JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO CONTINUE THE
 CASE MANAGEMENT CONFERENCE AND
 VACATE DATES**

Date: December 14, 2012
 Time: 8:30 a.m.
 Judge: Hon. Charles R. Breyer
 Place: Courtroom 6 -17th Floor

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STIPULATION

Plaintiffs Vernon Michael Lambson and Dinora Martinez (“Plaintiffs”) and Defendant The Ritz-Carlton Hotel Company, LLC (“Defendant”) (collectively “the Parties”), stipulate and agree as follows:

WHEREAS, on September 11, 2012 the Parties had a full day mediation session with private mediator David Rotman at which the Parties were not able to settle the case but continued settlement discussions with Mediator Rotman’s assistance;

WHEREAS, on December 5, 2012, Mediator Rotman made a second mediator’s proposal regarding a resolution in principle of litigation to be accepted by Noon December 10, 2012, which was extended to December 12, 2012 at 3:00 p.m.;

WHEREAS, on December 12, 2012, the Parties both accepted the second mediator’s proposal and reached a settlement of this matter in principle based on the same, subject to the Parties’ drafting of a long form Settlement Stipulation that shall be submitted to this Court for approval;

WHEREAS, this case is currently scheduled for a Case Management Conference on December 14, 2012 at 8:30 a.m.;

WHEREAS, the Court previously set Plaintiffs’ hearing for their Motion for Class Certification on May 3, 2013 at 10:00 a.m. [Doc. No. 32];

WHEREAS, the Parties believe it would conserve judicial resources and promote efficiency to vacate the Case Management Conference and the hearing on Plaintiffs’ Motion for Class Certification in light of the resolution in principle of this case; and

WHEREAS, the Parties have agreed that Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement shall be filed on or before February 1, 2013, and shall be set for hearing in accord with the Local Rules and based upon the availability of the Court;

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1 **IT IS HEREBY STIPULATED**, by the Parties that the Case Management Conference
2 and the hearing on Plaintiffs’ Motion for Class Certification shall be vacated. Plaintiffs’ Motion for
3 Preliminary Approval of Class Action Settlement shall be filed on or before February 1, 2013 and the
4 hearing for said Motion shall be in accord with the Local Rules and based upon the availability of the
5 Court.

6
7 DATED: December 12, 2012

LAW OFFICES OF PETER M. HART

8 By: /s/ Amber S. Healy
9 Peter M. Hart
10 Amber S. Healy
11 Attorney for Plaintiffs

12 DATED: December 12, 2012

O’MELVENY & MYERS, LLP

13 By: /s/ Adam P. KohSweeney
14 Adam P. KohSweeney
15 Attorneys for Defendant THE RITZ-
16 CARLTON HOTEL COMPANY, LLC
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~~PROPOSED~~ ORDER

The parties having so stipulated, and GOOD CAUSE APPEARING THEREFORE, IT IS HEREBY ORDERED that:

The Case Management Conference set for December 14, 2012, at 8:30 a.m. is hereby vacated; and

The hearing on Plaintiffs' Motion for Class Certification set for May 3, 2013, at 10:00 a.m. is hereby vacated.

Plaintiffs' Motion for Preliminary Approval of Class Action Settlement shall be filed on or before February 1, 2013 and the hearing for said Motion shall be in accord with the Local Rules and based upon the availability of the Court.

DATED: December 13, 2012

