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KEYPOINT GOVERNMENT SOLUTIONS, INC.

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18

19 DONALD LOUNIBOS, individually and
on behalf of all others similarly situated,

20 Plaintiff,

21 v.

22 KEYPOINT GOVERNMENT
23 SOLUTIONS, INC., a Delaware
Corporation, and Does 1-10, inclusive,

24 Defendants.
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Case No. 12-CV-0636 (EMC)

**NOTICE OF SETTLEMENT; JOINT
STIPULATION AND [PROPOSED] ORDER
TO VACATE CASE MANAGEMENT
CONFERENCE AND SET DEADLINE FOR
FILING MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT** (CMC reset for 2/14/13 at 1:30 p.m.)

1 **STIPULATION**

2 Plaintiff Donald Lounibos (“Plaintiff”) and Defendant Keypoint Government Solutions, Inc.
3 (“Defendant”) (collectively “the Parties”), stipulate and agree as follows:

4 **WHEREAS**, on November 2, 2012, the Parties had a full day mediation session with the
5 Hon. David Garcia (Ret.) (“Judge Garcia”) at JAMS in San Francisco, California, at which the Parties
6 were not able to settle the case but agreed to continue settlement discussions;

7 **WHEREAS**, the Parties since the last mediation session continued settlement discussions
8 through Judge Garcia and on November 14, 2012, the Parties reached a settlement in principle based on
9 the terms discussed at the mediation and based on further discussions and proposals made by the Parties
10 and by Judge Garcia and have resolved this matter on a class-wide basis;

11 **WHEREAS**, this case currently is scheduled for a Case Management Conference on November
12 30, 2012 at 10:30 A.M. (“the Case Management Conference”);

13 **WHEREAS**, the Parties believe it would conserve judicial resources and promote efficiency to
14 vacate the Case Management Conference in light of the resolution of this case;

15 **WHEREAS**, the Parties have agreed that Plaintiff’s Motion for Preliminary Approval of
16 Class Action Settlement (“Motion For Preliminary Approval”) shall be filed on or before January 10,
17 2013, and shall be set for hearing on February 14, 2013, or as soon thereafter as is convenient for the
18 Court;

19 **WHEREAS**, there is no trial date set for this case;

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1 **IT IS HEREBY STIPULATED** by the Parties herein, through their counsel of record, as
2 follows:

3 The Case Management Conference shall be vacated and the Motion for Preliminary Approval
4 shall be filed on or before January 10, 2013, and shall be set for hearing on February 14, 2013, or as soon
5 thereafter as is convenient for the Court.

6 **IT IS SO STIPULATED.**

8 DATED: November 19, 2012

NORTH BAY LAW GROUP

9
10 _____ /s/
11 David S. Harris
12 Attorney For Plaintiff
13 DONALD LOUNIBOS

14 DATED: November 19, 2012

LITTLER MENDELSON

15
16 _____ /s/
17 Karin Cogbill
18 Attorneys for Defendant
19 KEYPOINT GOVERNMENT SOLUTIONS

20 **[PROPOSED] ORDER**

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

23 The Case Management Conference set for November 30, 2012, at 10:30 a.m. is ~~VACATED~~
24 reset for 2/14/13 at 1:30 pm.

25 Plaintiff shall file the Motion for Preliminary Approval on or before January 10, 2013.

26 The hearing on the Motion for Preliminary Approval shall take place on February 14, 2013, at
27 1:30 p.m. in Courtroom 5.

28 DATED: November ²⁰, 2012

