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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)

**STIPULATION AND [PROPOSED] ORDER
CONTINUING DEADLINE FOR
FILING MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

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 engaged in a full day mediation session with the
5 Hon. David Garcia (Ret.) (“Judge Garcia”) at JAMS in San Francisco, California, at which time the
6 Parties were not able to settle the case but agreed to continue settlement discussions. Thereafter, the
7 Parties continued settlement discussions through Judge Garcia and on November 14, 2012, the Parties
8 reached a settlement in principle based on the terms discussed at the mediation and based on further
9 discussions and proposals made by the Parties and by Judge Garcia and have resolved this matter on a
10 class-wide basis;

11 **WHEREAS**, on November 19, 2012, the Parties filed a Notice of Settlement and Joint
12 Stipulation and Proposed Order to Vacate Case Management Conference and Set Deadline for Filing
13 Motion For Preliminary Approval of Class Action Settlement. This Stipulation and Proposed Ordered
14 was entered by the Court on November 20, 2012. In particular, the Court’s Order reset the Case
15 Management Conference and the hearing on the Motion for Preliminary Approval for February 14, 2013,
16 and set Plaintiff’s deadline to file its Motion for Preliminary Approval for on or before January 10, 2013;

17 **WHEREAS**, the Parties have been working on the terms of the settlement agreement, notice
18 and claim forms but require additional time to work through several issues and to file the Motion for
19 Preliminary Approval of Class Action Settlement.

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