

1 STEVEN L. HAMMOND (SBN 220521)
Hammond Law Group, P.C.
2 One Embarcadero Center, Suite 2360
San Francisco, California 94111
3 Telephone: (415) 955-1915

4 DAVID HARRIS (SBN 215224)
North Bay Law Group
5 116 E Blithedale Avenue, Suite 2
Mill Valley, CA 94941
6 Telephone: (415) 388-8788

7 FRANCIS SHEHADEH (SBN 251130)
Law Office of Francis J. Shehadeh
8 819 Eddy Street
San Francisco, CA 94109
9 Telephone: (415) 771-6174

10 Attorneys for Plaintiff
DONALD LOUNIBOS

11 MICHELLE B. HEVERLY (SBN 178660)
12 KARIN M. COGBILL (SBN 244606)
LITTLER MENDELSON, P.C.
13 50 W. San Fernando, 15th Floor
San Jose, CA 95113.2303
14 Telephone: (408) 998.4150

15 Attorneys for Defendant
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.
25
26
27
28

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 January 7, 2013, the Parties filed a Joint Stipulation and Proposed Order
12 Continuing Deadline for Filing Motion For Preliminary Approval of Class Action Settlement. This
13 Stipulation and Proposed Order was entered by the Court on January 9, 2013. In particular, the
14 Court’s Order reset the Case Management Conference and the hearing on the Motion for Preliminary
15 Approval for February 28, 2013, and set Plaintiff’s deadline to file its Motion for Preliminary Approval
16 for on or before January 24, 2013;

17 **WHEREAS**, the Parties have been working on the terms of the settlement agreement, notice and
18 claim forms but have not finalized all of these documents. As such, the parties require additional time to
19 finalize the terms of the settlement agreement, as well as to finalize the claim and notice forms and to
20 file the Motion for Preliminary Approval of Class Action Settlement.

21 ///
22 ///
23 ///
24 ///
25 ///
26 ///
27 ///
28 ///

