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7 Attorneys for Plaintiff
DONALD LOUNIBOS

8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

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

13 Plaintiff,

14 v.

15 KEYPOINT GOVERNMENT
SOLUTIONS, INC., a Delaware
16 Corporation, and Does 1-10, inclusive,

17 Defendants.
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Case No. 12-CV-0636 (JST)

**STIPULATION AND ~~PROPOSED~~ ORDER
CONTINUING PLAINTIFF'S DEADLINE
TO FILE NEW MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Assigned to Honorable Jon S. Tigar
450 Golden Gate Avenue
San Francisco, CA 94102

1 **STIPULATION**

2 The parties hereby stipulate as follows:

3 WHEREAS, on July 12, 2013, the Court issued an Order Denying Motion for Preliminary
4 Approval of Class Action Settlement (“Order”) (docket number 45). In particular, the Order, stated,
5 “Lounibos’ motion for preliminary approval of the proposed settlement is denied without prejudice.
6 Lounibos may file a new motion for preliminary approval of the proposed settlement that cures each of
7 the deficiencies identified in this Order within sixty days of the date this order is filed. A case
8 management conference will be held on October 2, 2013 at 2:00 p.m.”

9 WHEREAS, on October 8, 2013, the Court entered an Order continuing Plaintiff’s Deadline to
10 File New Motion for Preliminary Approval of Class Action Settlement. Pursuant to the October 8, 2013,
11 Order, Plaintiff’s current deadline to file a new Motion is October 30, 2013.

12 WHEREAS, the parties have come to agreement on all material terms to a modified settlement
13 that addresses the issues set forth in the Court’s Order, including, without limitation, a non-reversionary
14 settlement and a revised class definition. The parties are in the process of memorializing this modified
15 settlement; and

16 WHEREAS, in order to allow the parties to finalize the settlement and obtain all necessary
17 signatures, the parties request a fifteen (15) day extension of the current deadline in order to finalize the
18 modified settlement agreement and file a new motion for preliminary approval of class action settlement.

19 IT IS THEREFORE STIPULATED AND AGREED that Plaintiff shall file a new motion for
20 preliminary approval of class action settlement, which addresses the deficiencies set forth in the Court’s
21 Order, on or before November 14, 2013. The Case Management Conference, which is currently
22 scheduled to take place on December 4, 2013 at 2:00 P.M., shall be continued until December 18, 2012
23 at 2:00 P.M., or the next available date this is convenient for the Court.

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1 **IT IS SO STIPULATED.**

2 Respectfully submitted,

3 Date: October 29, 2013

NORTH BAY LAW GROUP

4
5 By _____ /s/ _____
 David Harris

6 Attorneys for Plaintiffs
7 DONALD LOUNIBOS

8 Date: October 29, 2013

LITTLER MENDELSON, P.C.

9
10 By _____ /s/ _____
 Michelle Heverly

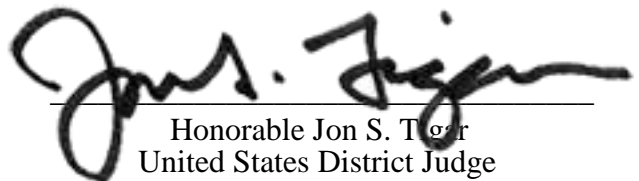
11 Attorneys for Defendants
12 KEYPOINT GOVERNMENT SOLUTIONS, INC.

13 **~~[PROPOSED]~~ ORDER**

14 **IT IS HEREBY ORDERED AS FOLLOWS:**

15 Plaintiff shall file a new motion for preliminary approval of class action settlement on or before
16 November 14, 2013. The Case Management Conference, currently scheduled for December 4, 2013,
17 shall be continued to January 22, 2014, at 2:00 P.M.

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19 DATED: October 29, 2013

20 
 Honorable Jon S. Tiger
 United States District Judge