

1 BRYAN SCHWARTZ LAW  
 2 BRYAN SCHWARTZ (SBN 209903)  
 3 WILLIAM C. WEEKS (SBN 289984)  
 1330 Broadway, Suite 1630  
 4 Oakland, CA 94612  
 Telephone: (510) 444-9300  
 5 Facsimile: (510) 444-9301  
 Email: bryan@bryanschwartzlaw.com

6 RUDY, EXELROD, ZIEFF & LOWE, L.L.P.  
 7 DAVID A. LOWE (SBN 178811)  
 JOHN T. MULLAN (SBN 221149)  
 351 California Street, Suite 700  
 San Francisco, CA 94104  
 8 Telephone: (415) 434-9800  
 Facsimile: (415) 434-0513  
 9 Email: dal@rezlaw.com  
 Email: jtm@rezlaw.com

10 *Attorneys for Plaintiffs*

11 UNITED STATES DISTRICT COURT

12 FOR THE NORTHERN DISTRICT OF CALIFORNIA

13 SAN FRANCISCO DIVISION

14 PETER WRIGHT and MICHELLE TRAME,  
 15 individually, on behalf of all others similarly  
 16 situated, and on behalf of the general public,

Case No. CV 12-00982 EMC

17 Plaintiffs,

18 **STIPULATION AND ~~[PROPOSED]~~**  
**ORDER CONTINUING DEADLINE**  
**TO FILE MOTION FOR FINAL**  
**APPROVAL OF CLASS ACTION**  
**SETTLEMENT**

19 v.

20 ADVENTURES ROLLING CROSS  
 COUNTRY, Inc., dba ADVENTURES  
 21 CROSS COUNTRY (ARCC), a California  
 Corporation, SCOTT VON ESCHEN, and  
 22 DOES 1 through 50 inclusive

Date:  
 Time:  
 Place: Courtroom 5, 17th Floor  
 Hon. Edward M. Chen

23 Defendants.

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25 Pursuant to Civil Local Rule 7-12, Plaintiffs Peter Wright and Michelle Trame (“Plaintiffs”)  
 26 and Defendants Adventures Rolling Cross Country, Inc. (“ARCC”) and Scott von Eschen  
 27 (“Defendants”), by and through their attorneys of record, make the following stipulated request  
 28

1 regarding the briefing deadline for Plaintiffs' impending Motion for Final Approval of Class Action  
2 Settlement, as follows:

3 WHEREAS, the Court initially set a Final Approval Hearing for January 16, 2013,  
4 and a deadline of November 28, 2013 for Plaintiffs' Motion for Final Approval;

5 WHEREAS, on November 19, 2013, the Court re-set the Final Approval Hearing  
6 Date for January 23, 2013;

7 WHEREAS, although the initial deadline for Class Members to postmark their Opt-in  
8 Forms in this class action was November 25, 2013, the Parties and the Claims Administrator  
9 extended that deadline to December 2, 2013, due to an error by the Claims Administrator causing a  
10 one-week delay in the provision of correct Notice Forms to the Class Members; as such, the Parties  
11 expect valid claims to continue to be submitted to the Claims Administrator through December 2,  
12 2013;

13 WHEREAS, in light of the deadline for submission of Claims forms, the Parties  
14 respectfully request to delay the deadline for submission of the Final Approval Motion, to allow the  
15 Final Approval Motion to describe accurately the Class Members' participation in the settlement;

16 WHEREAS, in light of the Court's continuance of the Final Approval Hearing date,  
17 there would be no prejudice to any party or the Court if the deadline for the Final Approval Motion  
18 were continued;

19 THEREFORE IT IS HEREBY STIPULATED AND REQUESTED by and between  
20 Plaintiffs and Defendants, through their respective counsel, that the Court continue the deadline for  
21 filing a Final Approval Motion to December 9, 2013, by which time all claims will have been  
22 submitted.

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Dated: November 21, 2013

BRYAN SCHWARTZ LAW

/s/ Bryan J. Schwartz

Bryan Schwartz, Bar No. 209903  
Attorney for Plaintiffs

Dated: November 21, 2013

HIRSCHFELD KRAEMER LLP

/s/ Reed E. Schaper

Reed E. Schaper, Bar No. 082792  
Attorneys for Defendants

~~[proposed]~~ ORDER

Pursuant to the stipulation, it is SO ORDERED.

