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13 Attorneys for Defendants,  
 JOHN EARL REDFERN, J. REDFERN, INC.,  
 14 dba GOLDEN STATE LANDSCAPING; JLS  
 PARTNERS, INC., dba GSL CONSTRUCTION,  
 15 EMPIRE LANDSCAPE CONSTRUCTION

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA

18 SAN FRANCISCO DIVISION

19 MARCOS VARGAS, ROMUALDO  
 20 ALTAMIRANO, PEDRO RAMOS,  
 BULMARO BAZAN, MARCOS  
 21 MANDUJANO, JOSE: SOLIS, LUIS  
 PENA, BENITO CHAIREZ, FIGUEROA,  
 22 FREDY ROCHA, SALVADOR FLORES,  
 ISMAEL CORONA, EPIGMENIO  
 23 LOPEZ, JUAN CORONA, ENRIQUE  
 TAMAYO, FRANCISCO SALGADO,  
 24 SILVERIO TORRES, MARTIN RAMOS  
 RAMIREZ, ANGEL SANCHEZ, ERON  
 25 LOPEZ, EDUARDO VARGAS, JORGE  
 SOTO, RIGOBERTO SANCHEZ:, JULIO  
 26 LOPEZ, JOSE J. GARCIA, PEDRO  
 SIERRA, DAMACIO SANCHEZ, JUAN  
 27 GUERRA, JAIME MARTINEZ JR.,  
 ROBERT MONTOYA, MATEO  
 28 GUZMAN, LAZARO MAYA, JOSE

Case No. C-12-04052-CRB

**JOINT STIPULATION AND ORDER  
 REGARDING RESPONSIVE PLEADING  
 TO THE COMPLAINT PURSUANT TO  
 LOCAL RULE 6-1**

JOINT STIP. AND [PROPOSED] ORDER  
 REGARDING RESPONSE TO COMPLAINT

1 ESTRADA, ANICETO ALMANZA  
2 SANCHEZ, EMILIO VARGAS, JOSE  
3 ANTONIO ALVAREZ, ANTONIO  
4 RODRIGUEZ, JOSEPH RENEE  
5 RODRIGUEZ, MAURICIO SANCHEZ,  
6 MAURICIO SANCHEZ ARZATE,  
7 MANUEL RENTERIA, MIGUEL  
8 SUCHIL MENDOZA, and VICENTE  
9 MARTINEZ, individually and on behalf of  
10 all others similarly situated,

11  
12 Plaintiffs,

13 v.

14 JOHN EARL REDFERN, an individual;  
15 J. REDFERN, INC., (dba "GOLDEN  
16 STATE LANDSCAPING"), a California  
17 Corporation; JLS PARTNERS, INC.,  
18 (dba "GSL CONSTRUCTION"), a  
19 California Corporation; and EMPIRE  
20 LANDSCAPE CONSTRUCTION, a  
21 California Corporation,

22 Defendants.

23 Plaintiffs Marcos Vargas, Romualdo Altamirano, Pedro Ramos, Bulmaro Bazan, Marcos  
24 Mandujano, Jose Solis, Luis Pena, Benito Chairez, Figueroa, Fredy Rocha, Salvador Flores, Ismael  
25 Corona, Epigmenio Lopez, Juan Corona, Enrique Tamayo, Francisco Salgado, Silverio Torres,  
26 Martin Ramos Ramirez, Angel Sanchez, Eron Lopez, Eduardo Vargas, Jorge Soto, Rigoberto  
27 Sanchez, Julio Lopez, Jose J. Garcia, Pedro Sierra, Damacio Sanchez, Juan Guerra, Jaime Martinez  
28 Jr., Robert Montoya, Mateo Guzman, Lazaro Maya, Jose Estrada, Aniceto Almanza Sanchez, Emilio  
Vargas, Jose Antonio Alvarez, Antonio Rodriguez, Joseph Renee Rodriguez, Mauricio Sanchez,  
Mauricio Sanchez Arzate, Manuel Renteria, Miguel Suchil Mendoza, and Vicente Martinez,  
(collectively "Plaintiffs") and Defendants John Earl Redfern, J. Redfern, Inc. (dba Golden State  
Landscaping), JLS Partners, Inc. (dba GSL Construction), and Empire Landscape Construction  
(collectively "Defendants") agree and stipulate, through their respective counsel, to the following  
extension:

1           1.       The parties are currently finalizing a settlement, and thus, they would like to direct  
2 their resources and time to settlement discussions.

3           2.       The settlement involves over forty individual plaintiffs and a proposed class  
4 settlement of a related state action, which is why it is taking quite a bit of time to finalize.

5           3.       The state court has indicated that the motion for approval of the state court class  
6 settlement should be filed no later than July 12, 2013.

7           4.       The settlement of the Plaintiffs' claims in this matter will be contingent upon court  
8 approval of the class settlement.

9           5.       The parties would like additional time to finalize the settlement agreements and have  
10 agreed to continue the deadline for Defendants' responsive pleading to Plaintiff's complaint from  
11 May 24, 2013 until July 16, 2013.

12           3.       The parties also request that the initial Case Management Conference, which is  
13 scheduled for June 14, 2013, also be postponed to August 7, 2013.

14           THEREFORE, the parties hereby stipulate and request that this Court order the following:

15           1.       The deadline for Defendants to file their responsive pleading to Plaintiffs' complaint  
16 is set for July 16, 2013.

17           2.       The Case Management Conference be scheduled for August 9, 2013 or to a date  
18 convenient for the Court.

1 Dated: May 24, 2013

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/s/ Marco A. Palau  
MARCO A. PALAU  
LAW OFFICES OF MALLISON &  
MARTINEZ  
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ROCHA, SALVADOR FLORES, ISMAEL  
CORONA, EPIGMENIO LOPEZ, JUAN  
CORONA, ENRIQUE TAMAYO,  
FRANCISCO SALGADO, SILVERIO  
TORRES, MARTIN RAMOS RAMIREZ,  
ANGEL SANCHEZ, ERON LOPEZ,  
EDUARDO VARGAS, JORGE SOTO,  
RIGOBERTO SANCHEZ:, JULIO LOPEZ,  
JOSE J. GARCIA, PEDRO SIERRA,  
DAMACIO SANCHEZ, JUAN GUERRA,  
JAIME MARTINEZ JR., ROBERT  
MONTOYA, MATEO GUZMAN, LAZARO  
MAYA, JOSE ESTRADA, ANICETO  
ALMANZA SANCHEZ, EMILIO VARGAS,  
JOSE ANTONIO ALVAREZ, ANTONIO  
RODRIGUEZ, JOSEPH RENEE  
RODRIGUEZ, MAURICIO SANCHEZ,  
MAURICIO SANCHEZ ARZATE, MANUEL  
RENTERIA, MIGUEL SUCHIL MENDOZA,  
and VICENTE MARTINEZ

Dated: May 24, 2013

/s/ Marlene S. Muraco  
MARLENE S. MURACO  
LITTLER MENDELSON  
A Professional Corporation  
Attorneys for Defendants  
JOHN EARL REDFERN, J. REDFERN, INC.,  
dba GOLDEN STATE LANDSCAPING; JLS  
PARTNERS, INC., dba GSL  
CONSTRUCTION, EMPIRE LANDSCAPE  
CONSTRUCTION

1 IT IS SO ORDERED:

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4 Dated: May 30, 2013

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7 Firmwide:120509945.1 059436.1001

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