

MILLER LAW GROUP
A PROFESSIONAL CORPORATION
CALIFORNIA

1 William T. Payne (SBN 90988)
Ellen M. Doyle (Pro Hac Vice)
2 Edward J. Feinstein (Pro Hac Vice)
FEINSTEIN DOYLE PAYNE
3 & KRAVEC, LLC
429 Forbes Avenue, 17th Floor
4 Pittsburgh, PA 15219
412-281-8400 (T), 412-281-1007 (F)
5 wpayne@stemberfeinstein.com
edoyle@stemberfeinstein.com
6 efeinstein@stemberfeinstein.com

7 Mark A. Potashnick (Pro Hac Vice)
WEINHAUS & POTASHNICK
8 11500 Olive Blvd., Suite 133
St. Louis, MO 63141
9 314-997-9150 (T), 314-997-9170 (F)
markp@wp-attorney.com

10 Ira Spiro (SBN 67641)
11 Jennifer Connor (SBN 241480)
SPIRO LAW CORP.
12 11377 W. Olympic Blvd., 5th Floor
Los Angeles, CA 89064
13 310-235-2350 (T), 310-235-2351 (F)
ira@spirolawcorp.com
14 jennifer@spirolawcorp.com

15 Attorneys for Plaintiffs
CHRISTOPHER OTEY, MARY GRETH &
16 THE CONDITIONALLY CERTIFIED FLSA
COLLECTIVE ACTION CLASS
17

18
19 IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 CHRISTOPHER OTEY & MARY GRETH, on
behalf of themselves and all others similarly
22 situated,
23 Plaintiff,
24 v.
25 CROWDFLOWER, INC., LUKAS BIEWALD
AND CHRIS VAN PELT,
26
27 Defendant(s).
28

Tracy Thompson (SBN 88173)
tt@millerlawgroup.com
M. Michael Cole (SBN 235538)
mmc@millerlawgroup.com
MILLER LAW GROUP
A Professional Corporation
111 Sutter Street, Suite 700
San Francisco, CA 94104
Tel. (415) 464-4300
Fax (415) 464-4336

Attorneys for Defendants
CROWDFLOWER, INC., LUKAS BIEWALD,
and CHRIS VAN PELT

Case No.: 3:12-cv-05524-JST/MEJ

**JOINT STIPULATION FOR BRIEF TWO-
WEEK EXTENSION OF TIME TO FILE NEW
MOTION FOR SETTLEMENT APPROVAL
AND**

[PROPOSED ORDER]

Complaint filed: October 26, 2012

1 Plaintiffs CHRISTOPHER OTEY and MARY GRETH ("Plaintiffs") and
2 Defendants CROWDFLOWER, INC., LUKAS BIEWALD, and CHRIS VAN PELT
3 ("Defendants"), by and through their respective counsel, hereby enter into the following Joint
4 Stipulation for Brief Two-Week Extension of Time to File New Motion for Settlement
5 Approval. Specifically, by and through this Stipulation, the parties request that the Court
6 continue the parties' deadline for filing a renewed motion for preliminary settlement approval
7 up to and including July 28, 2014.

8 **STIPULATION**

9 1. On April 15, 2014, this Court denied Plaintiff's Motion for Approval of Proposed
10 Settlement without prejudice. Doc. 195.

11 2. In that Order, the Court permitted the Plaintiffs to file a new motion for
12 settlement approval by July 14. *Id.*

13 3. The parties have corresponded / negotiated regarding terms of a new
14 settlement agreement and submission of a new motion for settlement approval, but they
15 need an **additional two weeks** to attempt to agree on certain new terms of settlement and
16 for Plaintiffs' counsel to prepare a new motion for settlement approval.

17 4. Such continuance will help facilitate a successful resolution.

18 WHEREFORE, the parties mutually request that the Court enter the proposed Order
19 below, thereby continuing the deadlines for filing a new motion for settlement approval.

21 Respectfully submitted,

22 Dated: July 11, 2014

WEINHAUS & POTASHNICK

24 By: /s/ Mark Postaschnick

25 Mark Potashnick
26 Attorneys for Plaintiffs
27 CHRISTOPHER OTEY, MARY GRETH
28 and the conditionally FLSA collective
action class

1 Dated: July 11, 2014

MILLER LAW GROUP
A Professional Corporation

2
3
4 By: /s/ Tracy Thompson
Tracy Thompson
Attorneys for Defendants
CROWDFLOWER, INC., LUKAS
BIEWALD, and CHRIS VAN PELT

5
6
7
8 ~~PROPOSED~~ ORDER

9 Good cause appearing therefore, the foregoing Joint Stipulation for Brief Two-
10 Week Extension of Time to File New Motion for Settlement Approval ("Stipulation") is hereby
11 approved and it is hereby ordered that:

12 Plaintiffs may file a new motion for settlement approval by July 28, 2014.

13
14 PURSUANT TO STIPULATION, IT IS SO ORDERED

15
16 Dated: July 15, 2014



17
18
19
20
21
22
23
24
25
26 4844-5464-3228, v. 1