

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).

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 A 30-DAY
EXTENSION OF TIME TO FILE NEW
MOTION FOR SETTLEMENT APPROVAL
AND REQUEST TO VACATE CASE
MANAGEMENT CONFERENCE 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 a 30-Day Extension of Time to File New Motion for Settlement Approval.
5 Specifically, by and through this Stipulation, the parties request that the Court continue the
6 parties’ deadline for filing a renewed motion for settlement approval, up to and including
7 March 18, 2015.

8 **STIPULATION**

9 1. On December 16, 2014, this Court denied Plaintiffs’ Motion for Approval of
10 Proposed Settlement without prejudice. (Doc. 210.)

11 2. In that Order, the Court permitted the Plaintiffs to file a new motion for
12 settlement approval by February 16, 2015. *Id.*

13 3. The Court further stated in its Order that if Plaintiffs file a new motion for
14 settlement approval by February 16, 2015, they may also request that the Court vacate the
15 Case Management Conference, set for March 11, 2015, at 2:00 p.m.

16 4. The parties have been in regular discussion with regard to negotiating the
17 terms of a new settlement agreement, and have been working diligently together in an effort
18 to address the concerns expressed by the Court in the December 16, 2014, Order. The
19 parties are committed to making a further attempt to reach agreement that will address all of
20 the Court’s concerns and, thereafter, to seeking the Court’s approval of the revised
21 agreement. Progress has been made on a number of issues; for example, the parties are in
22 agreement to remove the provision for reversion, and are exploring options for the handling
23 of any unclaimed funds. However, discussions are still in process, and no final agreement
24 has yet been reached. For these reasons, the parties believe they would benefit from a 30-
25 day extension in which to complete their negotiations and to prepare their papers in support
26 of approval. Accordingly, the parties respectfully request that the deadline for submission
27 be extended to March 18, 2015; that the March 11, 2015, and date currently set for the
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