

1 CHARLES L. THOMPSON, IV, State Bar No. 139927
 charles.thompson@ogletreedeakins.com
 2 BECKI D. GRAHAM, State Bar No. 238010
 becki.graham@ogletreedeakins.com
 3 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
 Steuart Tower, Suite 1300
 4 One Market Plaza
 San Francisco, CA 94105
 5 Telephone: 415.442.4810
 Facsimile: 415.442.4870

6 Attorneys for Defendant
 7 CONCENTRA HEALTH SERVICES, INC.

8 Claudia Center, State Bar No. 158255
 Jinny Kim, State Bar No. 208953
 9 Rachael Langston, State Bar No. 257950
 Gina Gemello, State Bar No. 282964
 10 The LEGAL AID SOCIETY –
 EMPLOYMENT LAW CENTER
 11 180 Montgomery Street, Suite 600
 San Francisco, CA 94104
 12 Telephone: (415) 864-8848
 Facsimile: (415) 593-0096
 13 Emails: ccenter@las-elc.org
 jkim@las-elc.org
 14 rlangston@las-elc.org
 ggemello@las-elc.org

15 Attorneys for Plaintiff
 16 PATRICIA CARDENAS

17
 18 **UNITED STATES DISTRICT COURT**
 19 **NORTHERN DISTRICT OF CALIFORNIA**

20
 21 PATRICIA CARDENAS,
 22 Plaintiff,
 23 v.
 24 CONCENTRA HEALTH SERVICES, INC.,
 25 Defendant.

Case No. 3:13-cv-01299 JST

**STIPULATION AND ~~PROPOSED~~ ORDER
 CONTINUING SETTLEMENT
 COMPLIANCE HEARING**

1 WHEREAS, on February 28, 2014, the Court issued an Order to File Stipulation of
2 Dismissal in which it additionally ordered a Settlement Compliance Hearing on April 30, 2014
3 (Docket No. 35);

4 WHEREAS, on April 14, 2014, Plaintiff Patricia Cardenas and Defendant Concentra Health
5 Services, Inc. submitted a Joint Case Management Statement in which they reported that the Parties
6 had resolved the matter at mediation and were finalizing the settlement agreement (Docket No. 36);

7 WHEREAS, the Court thereafter continued the previously set April 30, 2014 Settlement
8 Compliance Hearing to May 7, 2014 (Docket No. 37);

9 WHEREAS, the Court thereafter continued the p Settlement Compliance Hearing to May
10 14, 2014 (Docket No. 38);

11 WHEREAS, the parties have executed a settlement agreement, which preconditions
12 Plaintiff's filing of a dismissal on Defendant fulfilling certain obligations under the settlement
13 agreement;

14 WHEREAS, Defendant anticipates that on or about Wednesday, May 13, 2014, it will have
15 fulfilled its obligations under the settlement agreement that precondition Plaintiff's filing of a
16 dismissal;

17 WHEREAS, Plaintiff anticipates filing a dismissal of this action on or before May 20,
18 2014;

19 THEREFORE, the parties request that the Settlement Compliance Hearing be continued to
20 a date on or after May 20, 2014.

21 IT IS SO STIPULATED.

22 //

23 //

24 //

25 //

26 //

27 //

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: May 13, 2014

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

By: /s/Becki Graham
Charles L. Thompson, IV
Becki D. Graham
Attorneys for Defendant
CONCENTRA HEALTH SERVICES, INC.

DATED: May 13, 2014

THE LEGAL AID SOCIETY – EMPLOYMENT
LAW CENTER

By: /s/ Gina Gemello
Claudia Center
Jinny Kim
Rachael Langston
Gina Gemello

Attorneys for Plaintiff
PATRICIA CARDENAS

ECF CERTIFICATION

Pursuant to General Order No. 45 X(B), I attest that concurrence in the filing of this document has been obtained from Plaintiff’s counsel.

DATED: May 14, 2014

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

By: /s/ Becki Graham
Charles L. Thompson, IV
Becki D. Graham
Attorneys for Defendant
CONCENTRA HEALTH SERVICES, INC.

//
//
//

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

Good cause appearing, **IT IS SO ORDERED.**

The Settlement Compliance Hearing for May 13, 2014, shall be continued to
May 28, 2014.

Dated: May 13, 2014

By: _____

