

1 Daniel C. Girard (State Bar No. 114826)
2 Dena C. Sharp (State Bar No. 245869)
3 Adam E. Polk (State Bar No. 273000)
4 GIRARD GIBBS LLP
5 601 California Street, 14th Floor
6 San Francisco, California 94108
7 Telephone: (415) 981-4800
8 Facsimile: (415) 981-4846
9 Email: dcg@girardgibbs.com
10 Email: chc@girardgibbs.com
11 Email: aep@girardgibbs.com

12 (Additional Counsel on Signature Page)

13 Attorneys for Plaintiffs Lewis Booth
14 and Stephen Drews

15 **UNITED STATES DISTRICT COURT**
16 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

17 LEWIS BOOTH, as Trustee for the Booth Trust
18 dated 11-20-96, and STEPHEN DREWS, on
19 behalf of themselves and all others similarly
20 situated,

21 Plaintiffs,

22 v.

23 STRATEGIC REALTY TRUST, INC. (f/k/a
24 TNP STRATEGIC RETAIL TRUST, INC.),
25 THOMPSON NATIONAL PROPERTIES, LLC,
26 TNP STRATEGIC ADVISOR, LLC, TNP
27 SECURITIES, LLC, ANTHONY W.
28 THOMPSON, CHRISTOPHER S. CAMERON,
JAMES R. WOLFORD, JACK R. MAURER,
PHILLIP I. LEVIN, ARTHUR M. FRIEDMAN,
JEFFREY S. ROGERS, ROBERT N. RUTH,
and PETER K. KOMPANIEZ

Defendants.

CASE NO: 13-CV-04921-JST

STIPULATION AND ~~PROPOSED~~ ORDER
SUSPENDING DEADLINES IN LIGHT OF
PROPOSED SETTLEMENT

1 WHEREAS, on January 16, 2015, following a December 15, 2014 mediation before Hon.
2 Edward A. Infante (Ret.), Lead Plaintiffs Lewis Booth as Trustee for the Booth Trust dated 11-20-96
3 and Stephen Drews ("Plaintiffs"), and Defendants in this action (Strategic Realty Trust, Inc., Anthony
4 W. Thompson, Thompson National Properties, LLC, TNP Strategic Advisor, LLC and TNP Securities,
5 LLC, Phillip I. Levin, Arthur M. Friedman, Jeffrey S. Rogers, Robert N. Ruth, Peter K. Kompaniez,
6 James R. Wolford, and Jack R. Maurer ("Defendants")), reached a settlement in principle of all of the
7 claims of the putative class against the Defendants, subject to the Court's approval;

8 WHEREAS, counsel for Plaintiffs and Defendants are preparing formal documentation of the
9 settlement including a motion for preliminary approval of the settlement to submit to the Court;

10 WHEREAS, to allow the parties sufficient time to document their settlement, all parties to this
11 litigation respectfully request the Court's approval of an Order suspending for 60 days all deadlines set
12 forth in the operative Scheduling Order (Dkt. No. 73);

13 **NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND REQUEST THAT**
14 **THE COURT ORDER THAT:**

15 1. All pending deadlines set forth in the operative Scheduling Order (Dkt. No. 73) are
16 suspended for a 60 day period, pending submission to the Court of formal documentation of the
17 settlement and a motion for preliminary approval of the settlement.

18
19 Dated: January 20, 2015

Respectfully submitted,

20 **GIRARD GIBBS LLP**

21 /s/ Dena C. Sharp

22 Dena C. Sharp

23 Daniel C. Girard
24 Adam E. Polk
25 601 California Street, 14th Floor
26 San Francisco, California 94108
27 Telephone: (415) 981-4800
28 Facsimile: (415) 981-4846
Email: chc@girardgibbs.com
Email: dgc@girardgibbs.com
Email: aep@girardgibbs.com

-and-

John A. Kehoe
711 Third Avenue, 20th Floor
New York, New York 10017
Telephone: (212) 798-0159
Facsimile: (212) 867-1767
Email: jak@girardgibbs.com

Lead Counsel for Lead Plaintiffs and the Class

Peiffer Rosca Abdullah & Carr
Joseph C. Peiffer (pro hac vice)
201 St. Charles Avenue, Suite 4100
New Orleans, Louisiana 70170
Telephone: (504) 523-2434
Facsimile: (504) 523-2464
Email: jpeiffer@praclawfirm.com

Alan L. Rosca (pro hac vice)
526 Superior Avenue, Suite 401
Cleveland, Ohio 44114
Telephone: (888) 998-0520
Facsimile: (504) 586-5250
Email: arosca@praclawfirm.com

Additional Plaintiffs' Counsel

Dated: January 20, 2015

DLA PIPER LLP (US)

/s/ David Priebe
David Priebe

2000 University Avenue
East Palo Alto, CA 94303-2214
Telephone: (650) 833-2000
Facsimile: (650) 833-2001
Email: david.priebe@dlapiper.com

**Counsel for Strategic Realty Trust, Inc. (f/k/a TNP
Strategic Retail Trust, Inc.), Phillip I. Levin, Arthur M.
Friedman, Jeffrey S. Rogers, Robert N. Ruth, and Peter
K. Kompaniez**

1 Dated: January 20, 2015

ORRICK, HERRINGTON & SUTCLIFFE LLP

2 /s/ James N. Kramer

3 James N. Kramer

4 M. Todd Scott
5 The Orrick Building
6 405 Howard Street
7 San Francisco, CA 94105-2669
8 Telephone: (415) 773-5700
9 Facsimile: (415) 773-5759
10 Email: jkramer@orrick.com
11 Email: tscott@orrick.com

**Counsel for Christopher S. Cameron, James R. Wolford,
and Jack R. Maurer**

12 Dated: January 20, 2015

STRAGGAS & ASSOCIATES

13 /s/ George D. Straggas

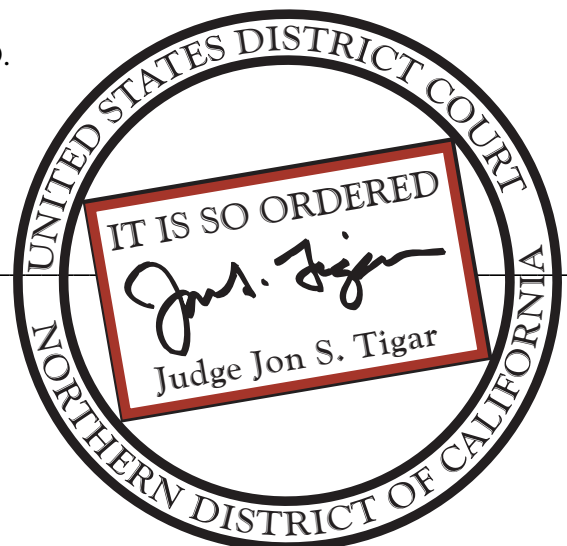
14 George D. Straggas

15 8911 Research Drive
16 Irvine, CA 92618
17 Telephone: (949) 660-9100
18 Facsimile: (949) 660-9144

**Counsel for Thompson National Properties, LLC, TNP
Strategic Advisor, LLC, TNP Securities, LLC, and
Anthony W. Thompson**

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

24 DATED: January 21, 2015



- 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

/s/ Dena C. Sharp