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Attorneys for Defendant Source Refrigeration & HVAC, Inc.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

LYLE E. GALEENER, individually and on
 behalf of all others similarly situated,

Plaintiff,

v.

SOURCE REFRIGERATION & HVAC, INC.,
 Defendant.

Case No. 13-cv-04960-VC

**STIPULATION AND ~~PROPOSED~~
 ORDER RE DEADLINE TO SUBMIT
 SETTLEMENT AGREEMENT**

The Honorable Vince Chhabria
 Courtroom 10; 19th Floor

1 Plaintiffs and Defendant Source Refrigeration & HVAC, Inc. ("Source") (collectively,
2 the "Parties") jointly submit this Stipulation and Proposed Order requesting that the Court
3 continue today's deadline (set on January 13, 2015 in Docket No. 111) for the parties to present
4 the settlement agreement to this coming Monday, February 2, 2015 at 5:00 p.m.

5 The parties have made significant progress and believe that they are on the verge of an
6 agreement. The parties anticipated filing the settlement agreement today by 5:00 p.m. but found
7 that they still had some disagreement, which they hope to resolve very shortly.
8

9 **THEREFORE**, the Parties respectfully request that the Court set Monday, February 2,
10 2015, at 5:00 p.m. as the deadline for Plaintiff to file the preliminary approval motion, including
11 the settlement agreement.
12

13 Dated: January 30, 2015

DLA PIPER LLP (US)

14
15 By: /s/ Margaret A. Keane
16 MARGARET A. KEANE
17 Attorneys for Defendant
SOURCE REFRIGERATION & HVAC,
INC.

18 Dated: January 30, 2015

OUTTEN & GOLDEN LLP

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20 By: /s/ Jahan Sagafi
21 JAHAN SAGAFI
22 Attorneys for Plaintiff and the Putative Class
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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that:

(1) Monday, February 2, 2015, at 5:00 p.m. is the deadline for Plaintiff to file the preliminary approval motion, including the settlement agreement.

IT IS SO ORDERED.

February 2
Dated: ~~January~~ ___, 2015



VINCE CHHABRIA
UNITED STATES DISTRICT JUDGE

1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over the age of
3 eighteen years and not a party to the within-entitled action. My business address is DLA Piper
4 LLP (US), 2000 Avenue of the Stars, Suite 400 North Tower, Los Angeles, California 90067-
4704. On January 30, 2015, I served the following document(s) described as:

5 **1. STIPULATION AND [PROPOSED] ORDER RE DEADLINE TO SUBMIT**
6 **SETTLEMENT AGREEMENT**

7 on interested parties in this action by placing ☐ the original ☒ true copy(ies) thereof enclosed in
8 sealed envelopes as stated below.

9 John M. Padilla, Esq.
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14 ☒ **(BY MAIL)** The envelope was mailed with postage thereon fully prepaid. As follows:
15 I am "readily familiar" with the firm's practice of collection and processing
16 correspondence for mailing. Under that practice it would be deposited with U.S. postal
17 service on that same day with postage thereon fully prepaid at Los Angeles, California in
the ordinary course of business. I am aware that on motion of the party served, service is
presumed invalid if postal cancellation date or postage meter date is more than one day
after date of deposit for mailing in affidavit.

18 ☐ **(BY FACSIMILE)** I delivered such document by facsimile to the following person(s) at
19 the facsimile telephone numbers listed above.

20 ☐ **(BY HAND DELIVERY)** I delivered the within documents to Ace Attorney Services for
21 delivery to the above address(es) with instructions that such envelope be delivered
personally on January 30, 2015 to the above named individual(s).

22 ☐ **(BY OVERNIGHT MAIL)** I am readily familiar with the firm's practice of collection
23 and processing correspondence for mailing with an overnight courier service. Under that
24 practice it would be deposited with said overnight courier service on that same day with
delivery charges thereon billed to sender's account, at Los Angeles, California in the
ordinary course of business. The envelope was sealed and placed for collection and
mailing on that date following ordinary business practices.

25 I declare under penalty of perjury under the laws of the State of California that the above
26 is true and correct.

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Executed on January 30, 2015, at Los Angeles, California.



Rea :Luster