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

20
 21 MICHAEL DEATRICK, individually and on
 behalf of all others similarly situated, and as
 22 representative of the State of California, et al.

23 Plaintiff,

24 v.

25 SECURITAS SECURITY SERVICES USA,
 INC.,

26 Defendant.
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Case No.: 3:13-cv-5016 JST

**STIPULATION AND ~~PROPOSED~~
 ORDER REGARDING SETTLEMENT**

1 Plaintiffs Michael Deatrck, the Opt-in Plaintiffs, and Defendant Securitas Security Services
2 USA, Inc. (“Securitas USA”) hereby stipulate and agree as follows:

3 WHEREAS, the parties submitted a STIPULATION AND [PROPOSED] ORDER
4 REGARDING SETTLEMENT AND VACATING MOTION DATES [ECF 140] on June 16, 2015,
5 informing that Court that they had reached agreement on the general terms of settlement in this action.

6 WHEREAS, the Court accepted the Parties’ stipulation and ordered [ECF 141] that a motion for
7 approval be submitted by August 7, 2015.

8 WHEREAS, the parties have been working diligently to negotiate additional necessary terms and
9 finalize a settlement agreement.

10 WHEREAS, due to the number and complexity of issues the parties require additional time to
11 document the settlement and submit a motion for approval.

12 The Parties THEREFORE STIPULATE, AGREE AND REQUEST AS FOLLOWS:

- 13 1. That the Court continue the current deadline of August 7, 2015, for the Plaintiffs to file a
14 motion for conditional certification of a settlement class or classes and for preliminary
15 approval of settlement to August 21, 2015.

16 Pursuant to Local Rule 5-1(i)(3), the undersigned filer of this document hereby attests that
17 concurrence in the filing has been obtained from each of the other signatories, which shall serve in lieu
18 of their signatures on the document.

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21 IT IS SO STIPULATED.

22 DATED: August 6, 2015

Respectfully submitted,

PROMETHEUS PARTNERS L.L.P.

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26 By: /s/ John R. Hurley
27 John R. Hurley, Esq.
28 Attorneys for Plaintiffs Michael Deatrck, et al.

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DATED: August 6, 2015

Respectfully submitted,
THARPE & HOWELL, LLP

By: /s/ Sherry B. Shavit
Sherry B. Shavit, Esq.
Attorneys for Defendant Securitas
Security Services USA, Inc.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: August 6, 2015

