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10 Attorneys for Defendant,
 11 SECURITAS SECURITY SERVICES, USA, INC.

12
 13 UNITED STATES DISTRICT COURT
 14 FOR THE NORTHERN DISTRICT OF CALIFORNIA

15
 16 MICHAEL DEATRICK, individually
 and on behalf of all others similarly
 17 situated, and as representative of the
 State of California,

18 Plaintiff,

19 v.

20 SECURITAS SECURITY SERVICES
 21 USA, INC.,

22 Defendant.
 23

Case No.: 3:13-cv-05016-JST

**JOINT STIPULATION AND
 [PROPOSED] ORDER EXTENDING
 TIME TO FILE MOTION FOR
 CONDITIONAL CERTIFICATION OF
 A SETTLEMENT CLASS OR
 CLASSES AND FOR PRELIMINARY
 APPROVAL OF SETTLEMENT**

1 **I. INTRODUCTION**

2 Pursuant to Civil Local Rules 6-1(b), 6-2 and 7-12, the undersigned counsel
3 hereby jointly request an order extending the time for the parties to file a motion for
4 conditional certification of a settlement class or classes and for preliminary approval
5 of settlement (herein the "Motion"). On June 18, 2015, this Court set a deadline for
6 the Motion to be filed on August 21, 2015. (ECF Doc. No. 143.)

7 **II. THE REQUESTED ORDER TO EXTEND TIME IS APPROPRIATE**

8 Pursuant to Local Rule 6-2(a), parties filing a stipulation requesting an order
9 extending time must (1) set forth with particularity the reasons for the requested
10 change, (2) disclose all previous time modifications in the case, whether by
11 stipulation or Court order, and (3) describe the effect that the requested time
12 modification would have on the schedule for the case.

13 **A. Reasons for the Requested Relief**

14 The parties have reached an agreement on the general terms of settlement on
15 behalf of all opt-in plaintiffs nationwide and a conditionally-certified Rule 23 class or
16 classes.

17 The parties continue to work diligently to negotiate additional and necessary
18 terms and finalize a settlement agreement. Due to the number and complexity of
19 issues, and need of various parties to review the drafts, additional time to document
20 the settlement, prepare the Motion and submit the Motion is needed. The parties
21 believe that an additional two (2) weeks are needed to iron out the remaining details
22 of the settlement agreement, obtain all signatures, and finalize the Motion.

23 **B. Previous Time Modifications**

24 The Court initially set an August 7, 2015 deadline to file the Motion. (ECF
25 Doc. No. 141.)

26 Due to the need for additional time to draft the settlement agreement and
27 Motion, the parties stipulated and requested a continuance of the August 7, 2015
28 deadline to August 21, 2015. (ECF Doc. No. 142.) The Court granted the

1 stipulation and continued the deadline to file the Motion to August 21, 2015. (ECF
2 Doc. No. 143.)

3 **C. Effect on Case Schedule**

4 Pursuant to Local Rule 6-2(a)(3), the requested extension would have no effect
5 on the case schedule other than fostering efficiency and the best interests of the
6 parties involved.

7 **III. STIPULATION**

8 THE PARTIES HEREBY STIPULATE, by and through their respective
9 counsel, as follows:

- 10 • That the Court continue the current deadline of August 21, 2015 to
11 September 4, 2015, for the Plaintiffs to file a motion for conditional
12 certification of a settlement class or classes and for preliminary approval
13 of settlement.

14
15 I, Sherry B. Shavit, am the ECF User whose identification and password are
16 being used to file this Stipulation. In compliance with Local Rule 5-1(i)(3), I attest
17 that all other signatories listed, and on whose behalf the filing is submitted, concur in
18 the filing's content and have authorized the filing.

19
20 **IT IS SO STIPULATED.**

21
22 Dated: August 21, 2015

LITTLER MENDELSON PC
J. KEVIN LILLY

24 THARPE & HOWELL, LLP

25 By: /s/ Sherry B. Shavit
26 SHERRY B. SHAVIT
27 STUART E. COHEN
28 Attorneys for Defendant,
SECURITAS SECURITY SERVICES
USA, INC.

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Dated: August 21, 2015

PROMETHEUS PARTNERS L.L.P.

By: /s/ John R. Hurley
JOHN R. HURLEY
Attorneys for Plaintiffs,
MICHAEL DEATRICK. et al.

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: August 25, 2015



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