

1 JUSTIN T. BERGER (SBN 250346)  
 jberger@cpmlegal.com  
 2 EMANUEL B. TOWNSEND (SBN 305373)  
 etownsend@cpmlegal.com  
 3 **COTCHETT, PITRE & McCARTHY, LLP**  
 San Francisco Airport Office Center  
 4 840 Malcolm Road  
 Burlingame, California 94010  
 5 Telephone: (650) 697-6000  
 Facsimile: (650) 692-3606

6 NOAH ZINNER (SBN 247581)  
 nzinner@heraca.org  
 7 GINA DI GIUSTO (SBN 293252)  
 gdigiusto@heraca.org  
 8 **HOUSING AND ECONOMIC RIGHTS**  
**ADVOCATES**  
 9 1814 Franklin Street, Suite 1040  
 Oakland, California 94612  
 10 Telephone: (510) 271-8443  
 11 Facsimile: (510) 280-2548

STEPHEN H. TURNER  
 Stephen.Turner@lewisbrisbois.com  
**LEWIS BRISBOIS BISGAARD & SMITH**  
**LLP**  
 221 North Figueroa Street, Suite 1200  
 Los Angeles, California 90012  
 Telephone: (213) 250-1800  
 Facsimile: (213) 250-7900

12 *Attorneys for Plaintiff Gena Hanson, Individually*  
 13 *and on Behalf of All Others Similarly Situated*

*Attorneys for Defendant JQD, LLC d/b/a PRO*  
**SOLUTIONS**

14 **IN THE UNITED STATES DISTRICT COURT**  
 15 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

16 **GENA HANSON**, individually and on behalf of )  
 all others similarly situated, )  
 17 )  
 Plaintiff, )  
 18 )  
 v. )  
 19 )  
**JQD, LLC, d/b/a PRO SOLUTIONS**, a )  
 20 California corporation; )  
 21 Defendant. )  
 22 )

Case No. 4:13-cv-05377-RS

**JOINT STIPULATION AND ~~[PROPOSED]~~**  
**ORDER TO EXTEND CLASS NOTICE**  
**DEADLINES AND MOVE FINAL**  
**APPROVAL HEARING**

Courtroom: 3  
 Judge: Hon. Richard Seeborg

1 WHEREAS, pursuant to the Court’s Order Granting Preliminary Approval of Settlement  
2 (“Preliminary Approval Order”), Defendant Pro Solutions (Defendant) was required to provide the  
3 claims administrator with specific data regarding the class members by no later than November 12,  
4 2016;

5 WHEREAS, pursuant to the Court’s Preliminary Approval Order, the claims administrator was  
6 required to mail notice postcards to the class members by no later than November 22, 2016;

7 WHEREAS, Defendant fulfilled its obligation and provided the claims administrator with the  
8 required class member data on or before November 12, 2016 (“Class Notice Deadline”);

9 WHEREAS, the class member data that Defendant provided to the claims administrator was  
10 larger than anticipated and contained certain data fields that were not self-explanatory, which in turn  
11 required the claims administrator to dedicate more time and effort than originally anticipated to process  
12 the data and identify the proper class members for notice;

13 WHEREAS, the claims administrator worked diligently with the Parties in an attempt to meet  
14 the November 22, 2016 Class Notice Deadline but ultimately determined that more time was needed to  
15 adequately process the data and identify the appropriate class members for notice;

16 WHEREAS, due to the unforeseen events described above, the parties now stipulate and  
17 request that the Court enter an order extending the Class Notice Deadline and all other related  
18 deadlines;

19 NOW, THEREFORE, the Parties hereby STIPULATE that the Court enter an order amending  
20 the Court’s Preliminary Approval Order of October 18, 2016 (Docket No. 80), as follows:

21 (1) Extending the Class Notice Deadline to thirty (30) days from the date the Court enters an  
22 order approving this STIPULATION;

23 (2) Extending the deadline for class counsel to file its application for attorney’s fees and  
24 expenses to sixty (60) days from the date the Court enters an order approving this STIPULATION;

25 (3) Extending the deadline for class members to submit their claims or requests for exclusion to  
26 seventy-five (75) days from the date the Court enters an order approving this STIPULATION;

27 (4) Extending the deadline for filing the motion in support of final approval to eighty-eight (88)  
28 days from the date the Court enters an order approving this STIPULATION; and

1 (5) Moving the final approval hearing date to the first Thursday falling one hundred and  
2 twenty-three (123) days from the date the Court enters an order approving this STIPULATION.

3  
4 Respectfully submitted,

5  
6 Dated: December 19, 2016

**COTCHETT, PITRE & McCARTHY, LLP**

7 By: /s/ Justin T. Berger

JUSTIN T. BERGER

8 EMANUEL B. TOWNSEND

9  
10 **HOUSING AND ECONOMIC RIGHTS ADVOCATES**

NOAH ZINNER

11 GINA DI GIUSTO

12 *Attorneys for Plaintiff and the Proposed Class*

13  
14  
15 Dated: December 19, 2016

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

16 By: /s/ Stephen H. Turner

STEPHEN H. TURNER

17  
18 *Attorneys for Defendant JQD, LLC d/b/a*  
19 *PRO SOLUTIONS*

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1 **~~PROPOSED~~ ORDER**

2 Pursuant to the STIPULATION of the Parties, it is hereby ordered that the Court's October 18,  
3 2016 Order Granting Preliminary Approval of Settlement ("Preliminary Approval Order") (Docket No.  
4 80) is amended as follows:

5 (1) The Class Notice Deadline shall be thirty (30) days from the date of entry of this order;

6 (2) The deadline for class counsel to file its application for attorney's fees and expenses shall  
7 be sixty (60) days from the date of entry of this order;

8 (3) The deadline for class members to submit their claims or requests for exclusion shall be  
9 seventy-five (75) days from the date of entry of this order;


10 (4) The deadline for filing the motion in support of final approval shall be eighty-eight (88)  
11 days from the date of entry of this order; and

12 (5) The final approval hearing shall take place on the first Thursday that falls one hundred and  
13 twenty-three (123) days from the date of entry of this order. Final Approval Hearing 4/27/2017 at 1:30 p.m.

14 In all other respects, the Court's Preliminary Approval Order remains in full force and effect.

15  
16 IT IS SO ORDERED.

17 DATED: 12/20/16

18   
19 HON. RICHARD SEEBOLD  
20 UNITED STATES DISTRICT COURT  
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