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 16 LINEBARGER GOGGAN BLAIR & SAMPSON LLP,
 17 a Texas limited liability partnership

18 [Names and Addresses of Additional
 19 Counsel Listed on Signature Pages]

20 **UNITED STATES DISTRICT COURT**
 21 **NORTHERN DISTRICT OF CALIFORNIA**
 22 **SAN FRANCISCO**

23 4EC HOLDINGS, LLC, a Delaware limited liability
 24 company,

25 Plaintiff,

26 vs.

27 LINEBARGER GOGGAN BLAIR & SAMPSON
 28 LLP, a Texas limited liability partnership,

Defendant.

Case No. 3:14-cv-01944 VC
 (Class Action)

**FURTHER STIPULATED ORDER
 CONCERNING PLAINTIFF’S
 RENEWED MOTION FOR
 PRELIMINARY APPROVAL OF
 CLASS SETTLEMENT
 (DKT. NO. 73)**

Courtroom of the Honorable
 Vince Chhabria

This stipulation is made between Plaintiff 4EC Holdings, LLC, a Delaware limited liability company (“Plaintiff”), and Defendant Linebarger Goggan Blair & Sampson LLP, a Texas limited liability partnership (“Defendant”) (collectively, “the Parties”), through their respective attorneys of record, and pertains to Plaintiff’s pending Renewed Motion for Preliminary Approval of Class Settlement (the “Renewed Motion”), which is calendared for hearing before the Court on August 20, 2015.

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THE PARTIES AGREE AND STIPULATE AS FOLLOWS:

In response to the Court’s Order re Preliminary Approval Hearing entered August 17, 2015 (the “August 17 Order”), the parties have agreed upon and prepared an Amended and Corrected Stipulation of Class Action Settlement and Release (the “Amended and Corrected Stipulation”). The Amended and Corrected Stipulation, including its exhibits, is being filed with the Court concurrently with this stipulation. The Amended and Corrected Stipulation supersedes all prior stipulations concerning the terms of the proposed Settlement of this action – specifically the stipulations filed with the Court on December 30, 2014; March 24, 2015, July 10, 2015 and July 22, 2015 (Dkts. 50, 65, 76 & 81). The parties request that Plaintiff’s Renewed Motion for Preliminary Approval of Class Settlement (Dkt. No. 73) be deemed to seek approval of the Settlement as set forth in the Amended and Corrected Stipulation. Although the Amended and Corrected Stipulation reflects no substantive changes to the Settlement terms as between the parties, the parties believe that the Amended and Corrected Stipulation responds to the issues, typographical and otherwise, that the Court noted in its August 17 Order. Plaintiffs note their desire to discuss at the August 20, 2015 hearing their planned application for an award of attorneys’ fees and expenses, and the possibility of a supplemental application.

The August 17 Order requested that the parties have available for the Court redlined versions of the Amended and Corrected Stipulation and its exhibits. The parties intend to have those redlined versions delivered to Chambers today by electronic mail, per instructions from the Court’s deputy. Additionally, the corrected Proposed Order Preliminarily Approving Settlement as Amended and

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1 Providing for Notice will be submitted to Chambers in Word version today, consistent with the
2 Court's standing order.

3 **IT IS SO AGREED AND STIPULATED this 19th DAY OF AUGUST, 2015.**

4 **Submitted Jointly By:**

5 VINSON & ELKINS LLP

6
7 By /s/ Michael L. Charlson
8 Michael L. Charlson

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PROPOSED ORDER

Pursuant to the Stipulation of the parties and upon good cause showing, **IT IS SO ORDERED.**

DATED: August 20, 2015



Honorable Vince Chhabria
United States District Judge