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Attorneys for Defendants
FAST WATER HEATER PARTNERS I, LP
DBA FAST WATER HEATER COMPANY,
FWH ACQUISITION COMPANY, LLC DBA
FAST WATER HEATER COMPANY;
JEFFREY DAVID JORDAN; AND JASON
SPARKS HANLEYBROWN

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

MIHAIL SLAVKOV, NIKOLA
VLAOVIC AND MARTIN ARNAUDOV,
individually and on behalf of those
similarly situated,

Plaintiffs,

v.

FAST WATER HEATER PARTNERS I,
LP dba Fast Water Heater Company, a
Delaware Limited Partnership; FWH
ACQUISITION COMPANY, LLC dba
Fast Water Heater Company, a Delaware
Limited Liability Company; JEFFREY
DAVID JORDAN, an individual; and
JASON SPARKS HANLEYBROWN, an
individual,

Defendants.

Case No. CV 14-4324 JST

**JOINT STIPULATION AND NOTICE OF
SETTLEMENT AND ~~PROPOSED~~
ORDER**

1 **STIPULATION FOR A CONTINUANCE AND STAY OF LITIGATION**

2 On June 2, 2016, the Parties to this litigation attended a settlement conference before
3 Magistrate Judge Sallie Kim. (ECF No. 101.) Although the Parties did not settle, they will
4 continue discussions and will attend a second settlement conference with Judge Kim on August 8,
5 2016. (ECF No. 101.) In furtherance of continued discussions and in anticipation of reaching a
6 settlement, Plaintiffs MIHAIL SLAVKOV, NIKOLA VLAOVIC, and MARTIN ARNAUDOV
7 (“Plaintiffs”) and Defendants FAST WATER HEATER PARTNERS I, LP dba Fast Water Heater
8 Company; FWH ACQUISITION COMPANY, LLC dba Fast Water Heater Company; JEFFREY
9 DAVID JORDAN; and JASON SPARKS HANLEYBROWN (“Defendants”), stipulate to and
10 request that the Court issue an order as follows: The current stay of litigation is lifted for the
11 limited purpose of allowing Defendants to communicate with and attempt to enter into settlement
12 agreements with individual members of the putative class; the stay on all other litigation
13 activities, including discovery and pretrial motions (except for settlement discussions and motions
14 that address settlement only), is extended to September 21, 2016; the statutes of limitations
15 relating to any potential claim under Labor Code section 558.1 and the Fair Labor Standards Act
16 for Plaintiffs and the putative class and collective action members is tolled until to November 7,
17 2016; and Plaintiffs’ deadline to file a motion for class certification is continued to November 7,
18 2016.

19 DATED: June 7, 2016

PERKINS COIE LLP

20
21 By: /s/ Jonathan S. Longino
Jonathan S. Longino

22 Attorneys for Defendants

23 DATED: June 7, 2016

WOODALL LAW OFFICES

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25 By: /s/ Kevin F. Woodall
Kevin F. Woodall

26 Attorneys for Plaintiffs
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PROPOSED ORDER

PURSUANT TO THE STIPULATION OF THE PARTIES, and finding good cause therein, IT IS ORDERED that:

1. The statutes of limitation relating to any potential claims under Labor Code section 558.1 and the Fair Labor Standards Act shall be tolled for Plaintiffs and the putative class and collective action members until November 7, 2016;

2. During the stay, Defendants may communicate with and attempt to enter into individual settlement agreements with putative class members;

3. All other litigation activities, including discovery and pretrial motions (except for motions that address settlement only), shall be stayed until September 21, 2016; and

4. Any deadlines relating to the class certification motion shall be continued as follows: (1) Plaintiffs' deadline to file a class certification motion shall be November ⁷ 6, 2016; (2) Defendants' deadline to file an opposition to Plaintiffs' class certification motion shall be December 6, 2016; and (3) Plaintiffs' deadline to file the reply brief papers in support of their class certification motion shall be December 27, 2016.

IT IS SO ORDERED.

DATED: June 7, 2016



HON. JON S. TIGAR
UNITED STATES DISTRICT COURT JUDGE

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