

1 MARA E. ROSALES, State Bar No. 104844  
 2 *mara@rosaleslawpartners.com*  
 3 ROBERT D. SANFORD, State Bar No.129790  
 4 *dusty@rosaleslawpartners.com*  
 5 ROSALES LAW PARTNERS LLP  
 433 California Street, Suite 630  
 San Francisco, CA 94104  
 Telephone: (415) 986-4760

6 Attorneys for Defendant  
 7 PACIFIC GATEWAY CONCESSIONS LLC.

8 IN THE UNITED STATES DISTRICT COURT  
 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11	RACHEL HOCHSTETLER,	)	CASE NO. 3:14-CV-04748-TEH
12	CIRENA TORRES,	)	
		)	<b>STIPULATION AND <del>PROPOSED</del></b>
		)	<b>ORDER CONTINUING INITIAL CASE</b>
		)	<b>MANAGEMENT CONFERENCE</b>
13	vs.	)	
	Plaintiffs,	)	
14	PACIFIC GATEWAY CONCESSIONS LLC, et	)	Date: April 13, 2015
15	al.,	)	Time: 1:30 p.m.
		)	Courtroom: 12
	Defendants.	)	
16	_____	)	
17	PACIFIC GATEWAY CONCESSIONS LLC, et	)	
18	al.,	)	
		)	
	Cross-Claimant,	)	
19	vs.	)	
		)	
20	POINT SOLUTIONS, LLC,	)	
21		)	
	Cross-Defendant.	)	
22	_____	)	

23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**STIPULATION**

Plaintiffs Rachel Hochstetler and Cirena Torres, Defendant and Cross-Claimant Pacific Gateway Concessions LLC ("PGC"), and Cross-Defendant Point Solutions, LLC ("PS") hereby stipulate as follows:

**Recitals**

1. The Initial Case Management Conference in this action was originally scheduled for February 2, 2015, per the Clerk's Notice Scheduling Case Management Conference on Reassignment (Docket 12), then continued until April 13, 2015 since PS had not yet appeared in the action (Docket 24).

2. On April 1, 2015, the parties participated in a mediation before court-appointed mediator David Bluhm. As a result of the mediation, Plaintiffs and PGC reached a tentative settlement of the class action by agreeing to a settlement fund for putative class members. Plaintiffs and PGC are presently discussing payment of attorney fees and costs to Plaintiffs' counsel if counsel is appointed class counsel and payment of an incentive award to the Plaintiffs if they are appointed class representatives. If Plaintiffs and PGC are able to reach agreement on all settlement terms, they intend to seek preliminary approval of the class settlement from the Court. PGC and PS also engaged in settlement negotiations during the mediation, which are still ongoing.

3. In the interest of efficient case management and minimizing the burden of the action on the Court's resources, the parties agree that the Initial Case Management Conference should be continued from April 13, 2015 for 60 days in order to permit settlement discussions to conclude.

///  
///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**Stipulation**

4. Based on the foregoing recitals, the parties stipulate that the Initial Case Management Conference of April 13, 2015 should be continued for 60 days in order to permit settlement discussions to conclude.

So Stipulated.

Dated: April 2, 2015

CHANT & COMPANY,  
A Professional Law Corporation

By: /s/ Chant Yedalian  
CHANT YEDALIAN  
Attorneys for Plaintiffs  
RACHEL HOCHSTETLER and CIRENA  
TORRES

Dated: April 2, 2015

ROSALES LAW PARTNERS LLP

By: /s/ Robert D. Sanford  
ROBERT D. SANFORD  
Attorney for Defendant and Cross-Claimant  
PACIFIC GATEWAY CONCESSIONS  
LLC

Dated: April 2, 2015  
LLP

HUDDLESTON & SIPOS LAW GROUP

By: /s/ Robert A. Huddleston  
ROBERT A. HUDDLESTON  
Attorney for Cross- Defendant  
POINT SOLUTIONS, LLC

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

Pursuant to stipulation, it is so ordered. The Initial Case Management Conference shall occur on June 15, 2015 at 1:30 pm in Courtroom 12 on the 19th floor, United States District Courthouse, 450 Golden Gate Avenue, San Francisco, CA 94102. Not less than seven days prior, counsel shall submit a joint case management conference statement, and all other deadlines are continued according to the new date of the Initial Case Management Conference.

Dated: April 6, 2015

