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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,)
 12 CIRENA TORRES,)
 13 vs. Plaintiffs,)
 14 PACIFIC GATEWAY CONCESSIONS LLC, et)
 15 al.,)
 16 Defendants.)

CASE NO. 3:14-CV-04748-TEH
)
) **STIPULATION AND ~~PROPOSED~~**
) **ORDER CONTINUING OR**
) **VACATING AUGUST 31, 2015**
) **INITIAL CASE MANAGEMENT**
) **CONFERENCE**

Date: August 31, 2015
 Time: 1:30 p.m.
 Courtroom: 12

17 PACIFIC GATEWAY CONCESSIONS LLC, et)
 18 al.,)
 19 vs. Cross-Claimant,)
 20 POINT SOLUTIONS, LLC,)
 21 Cross-Defendant.)
 22)

1 **STIPULATION**

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

5 **Recitals**

6 1. The Initial Case Management Conference in this action has been continued
7 three times to allow the parties an opportunity to negotiate settlement. (Docket 24, 29,
8 32.) Plaintiffs and PGC reached agreement on settlement of the putative class action,
9 which was memorialized in a Memorandum of Understanding of Settlement ("MOU")
10 signed on June 8, 2015. Plaintiffs and PGC have since negotiated and executed a detailed
11 Stipulated Settlement Agreement and Release ("Class Settlement Agreement"). Pursuant
12 to Federal Rule of Civil Procedure 23(e), Plaintiffs will shortly file a motion seeking the
13 Court's preliminary approval of the Class Settlement Agreement.

14 2. PGC and PS have reached agreement on the major details of the settlement
15 of PGC's cross-claim for indemnity and contribution and for breach of contract. PGC and
16 PS anticipate that a formal settlement agreement should be signed shortly, pursuant to
17 which PGC's cross-claim would be dismissed in conjunction with the Court's final
18 approval of the Class Settlement Agreement.

19 3. In the interest of efficient case management and minimizing the burden of
20 the action on the Court's resources, the parties agree that the August 31, 2015 Case
21 Management Conference should be, at the Court's discretion, either: (i) continued from
22 August 31, 2015 for 60 days in order to permit Plaintiffs to file the motion for preliminary
23 approval of the Class Settlement Agreement, then vacated once the motion is filed; or (ii)
24 vacated now.

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Stipulation

4. Based on the foregoing recitals, the parties stipulate that the Initial Case Management Conference of August 31, 2015 should be, at the Court's discretion, either continued for 60 days to allow the motion for preliminary approval of the Class Settlement Agreement to be filed, then vacated once the motion is filed, or vacated immediately.

So Stipulated.

Dated: August 24, 2015

CHANT & COMPANY
A Professional Law Corporation

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

Dated: August 24, 2015

ROSALES LAW PARTNERS LLP

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

Dated: August 24, 2015
LLP

HUDDLESTON & SIPOS LAW GROUP

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

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ORDER

Pursuant to stipulation, it is ordered as follows:

The Initial Case Management Conference shall occur on 10/26, 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. Once Plaintiffs file a motion for preliminary approval of the Class Settlement Agreement, the Initial Case Management Conference shall be vacated.

[OR]

~~The August 31, 2015 Initial Case Management Conference is vacated pending Plaintiffs' filing of a motion for preliminary approval of the Class Settlement Agreement.~~

Dated: August 25, 2015



Honorable Thelton E. Henderson
United States District Court Judge