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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

19 PAULA DONALD, on behalf of herself, all
20 others similarly situated, and the general
21 public

Plaintiff,

vs.

23 XANITOS, INC., a Delaware corporation,
24 KAISER FOUNDATION HOSPITALS,
25 INC., a California corporation, and DOES 1
26 through 10, inclusive,

Defendants.

) CASE NO. 3:14-cv-05416 WHO

)
) **STIPULATION AND ORDER TO**
) **CONTINUE FINAL APPROVAL**
) **HEARING**

)
) Date: March 29, 2017
) Time: 2:00 p.m.

27 The parties to the above-entitled action jointly submit this STIPULATION AND
28 [PROPOSED] ORDER TO CONTINUE FINAL APPROVAL HEARING, currently scheduled

1 for March 29, 2017 at 2:00 p.m.

2 WHEREAS on December 9, 2016, the Court granted Plaintiff's Motion for Preliminary
3 Approval of Class Action Settlement;

4 WHEREAS as part of the Court's December 9, 2016 Order, a Final Approval Hearing
5 was scheduled for March 29, 2017 at 2 p.m.;

6 WHEREAS based on the parties' agreement and the Court's December 9, 2016 Order,
7 any class member who wishes to not participate in the settlement may request exclusion from the
8 class by submitting a signed request within sixty (60) days following the date of the initial
9 mailing of the Settlement Notice Packet;

10 WHEREAS based on the parties' agreement and the Court's December 9, 2016 Order,
11 any class member who wishes to object to the proposed settlement must present written
12 objections to the Court within sixty (60) days following the date of the initial mailing of the
13 Settlement Notice Packet;

14 WHEREAS based on the sixty-day notice period, the deadline to mail the Settlement
15 Notice Packet was December 30, 2017;

16 WHEREAS given the holidays and that two separate payroll systems needed to be cross-
17 referenced, Defendant Xanitos, Inc. ("Xanitos") was unable to compile the class member data
18 necessary to complete the Settlement Notice Packets until January 5, 2017;

19 WHEREAS defense counsel then reviewed the data provided by Xanitos, determining
20 that there were some errors in the data and that additional work is required in order to complete
21 the Settlement Notice Packets;

22 WHEREAS defense counsel has been working diligently with Xanitos to provide
23 complete and accurate information;

24 WHEREAS the accuracy of data is essential to ensure proper allocation of the settlement
25 funds to class members;

26 WHEREAS defense counsel expects that complete and accurate data will be transmitted
27 to the claims administrator by no later than January 30, 2017;

28 Accordingly, the parties respectfully request a short continuance of the final fairness

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hearing of approximately thirty (30) days to allow the Xanitos to complete the compilation of class member data, to mail the Settlement Notice Packet, and to permit class members to provide a response within the deadlines provided.

Pursuant to Local Rule 5-1, the filer of this document attests that concurrence in the filing of the same has been obtained from each of the other signatories.

Dated: January 23, 2017

GORDON & REES LLP

By: /s/ Mollie M. Burks
Mark S. Posard
Mollie M. Burks
Sara A. Moore
Attorneys for Defendants
XANITOS, INC. and KAISER
FOUNDATION HOSPITALS,
INC.

Dated: January 23, 2017

HOFFMAN EMPLOYMENT LAWYERS,
LLP

By: /s/ Leonard Emma
Michael Hoffman
Leonard Emma
Stephen Noel Ilg
Attorneys for Plaintiff
PAULA DONALD

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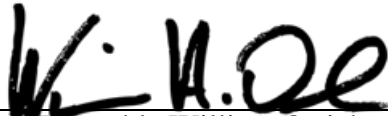
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ORDER

Pursuant to the parties' Stipulation, and good causing appearing therefor, the Court hereby continues the March 29, 2017 Final Approval Hearing until April 26, 2017. All applicable deadlines are modified accordingly.

IT IS SO ORDERED.

Dated: January 24, 2017


The Honorable William Orrick