

1 EMILY P. RICH, Bar No. 168735
 2 CONCEPCIÓN E. LOZANO-BATISTA, Bar No. 227227
 3 WEINBERG, ROGER & ROSENFELD, P.C.
 A Professional Corporation
 4 1001 Marina Village Parkway, Suite 200
 Alameda, CA 94501
 Telephone (510) 337-1001
 Fax (510) 337-1023
 5 E-Mail: erich@unioncounsel.net
 clozano@unioncounsel.net

6
 7 JULIA PENNY CLARK (*admitted pro hac vice*)
 ROBERT ALEXANDER (*admitted pro hac vice*)
 8 JAMES GRAHAM LAKE (*admitted pro hac vice*)
 BREDHOFF & KAISER, P.L.L.C.
 9 805 Fifteenth St. N.W. Tenth Floor
 Washington, DC 20005
 Telephone (202) 842-2600
 Fax (202) 842-1888
 10 E-Mail: jpclark@bredhoff.com
 ralexander@bredhoff.com
 11 glake@bredhoff.com

12
 13 Attorneys for Defendants

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

16 JUAN M. REYES, SALVATORE TAGLIARENI,
 17 ANGEL DE LA CRUZ, ANTONIO MEROLLA,
 SMAIL MUSOVIC, TESFAYE GHEBREMEDHIN,
 18 PHILIP ROGERS, ALMOND REID, CARMELO
 CALABRO, RUSSELL NEUBERT, and
 19 JOHN WILLIAMS, individually and as
 representatives on behalf of a class of similarly
 20 situated persons,

21 Plaintiffs,

22 v.

23 BAKERY AND CONFECTIONERY UNION AND
 INDUSTRY INTERNATIONAL PENSION FUND;
 24 and STEVEN BERTELLI, DAVID B. DURKEE,
 JETHRO A. HEAD, ART MONTMINY, ROBERT
 25 OAKLEY, JAMES RIVERS, RANDY D. ROARK,
 BARBARA BRASIER, TRAVIS CLEMENS, JON
 26 MCPHERSON, LOU MINELLA, DOUG
 RUYGROK, and JOHN WAGNER, in their official
 27 capacities as Trustees,

28 Defendants.

Case No. 3:14-cv-5596 (JST)

**JOINT STIPULATION TO
 EXTEND DEADLINES FOR
 PENDING MOTIONS**

The Honorable Jon S. Tigar

1 **JOINT STIPULATION**

2 Pursuant to Local Rule 6-2(a), Plaintiffs and Defendants hereby stipulate and request that
3 the Court extend the deadline for Defendants to file their opposition to Plaintiffs’ Motion for
4 Attorneys’ Fees and Costs from August 17, 2017, to August 29, 2017, extend the deadline for
5 Defendants to file their statement of non-opposition to Plaintiffs’ Motion for Final Approval of
6 Class Action Settlement from August 17, 2017, to August 29, 2017, and extend the deadline for
7 Plaintiffs to file their reply to their Motion for Attorneys’ Fees and Costs from August 24, 2017,
8 to September 15, 2017. In support of this request, the parties state as follows:

9 1. The parties request this extension in order to permit Defendants to respond
10 thoroughly to the extensive factual issues raised in Plaintiffs’ Motion for Attorneys’ Fees and
11 Costs. Defendants’ counsel have pre-existing work and vacation commitments that would make
12 it difficult to provide a response by the current deadline. And Defendants’ counsel further believe
13 it will be appropriate and useful to have its statement of non-opposition to Plaintiffs’ Motion for
14 Final Approval of Class Action Settlement due on the same day, so that they can coordinate the
15 two filings.

16 2. This extension would also consolidate Plaintiffs’ briefing allowing their reply to be
17 filed following the presently set objection deadline of August 31, 2017 thus allowing in a single
18 pleading Plaintiffs’ reply to Defendants’ briefing on fees and costs and response to any Class
19 Member objections to the motion for fees and costs.

20 Consistent with the Local Rules, previous time modifications in this case are set forth in
21 the accompanying declaration as is a description of the effect of the requested time modification.

22 WHEREFORE, Plaintiffs and Defendants jointly request that the Court grant their request
23 for an extension of the deadline for Defendants to file their opposition to Plaintiffs’ Motion for
24 Attorneys’ Fees and Costs from August 17, 2017, to August 29, 2017, an extension of the
25 deadline for Defendants to file their statement of non-opposition to Plaintiffs’ Motion for Final
26 Approval of Class Action Settlement from August 17, 2017, to August 29, 2017, and an
27 extension of the deadline for Plaintiffs to file their reply to their Motion for Attorneys’ Fees and
28 Costs from August 24, 2017, to September 15, 2017.

Dated: August 9, 2017

ABBEY SPANIER LLP
FRUMKIN & HUNTER LLP
LAW OFFICE OF GEOFFREY V. WHITE
SINCLAIR LAW FIRM

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

By: /s/ Thomas O. Sinclair
(with authorization by email on August 9, 2017)
WILLIAM D. FRUMKIN (admitted pro hac vice)
ELIZABETH E. HUNTER (admitted pro hac vice)
NANCY KABOOLIAN (pro hac vice to be filed)
THOMAS O. SINCLAIR (admitted pro hac vice)
JUDITH L. SPANIER (admitted pro hac vice)
GEOFFREY V. WHITE

Dated: August 9, 2017

Attorneys for Plaintiff
BREDHOFF & KAISER, PLLC
WEINBERG, ROGER & ROSENFELD

By: /s/ Robert Alexander
ROBERT ALEXANDER (admitted pro hac vice)
JULIA PENNY CLARK (admitted pro hac vice)
JAMES GRAHAM LAKE (admitted pro hac vice)
CONCEPCIÓN E. LOZANO-BATISTA
EMILY P. RICH

Attorneys for Defendants

~~[PROPOSED]~~ ORDER

The parties' Joint Stipulation to Extend Deadlines for Motion for Pending Motions is GRANTED. The deadline for Defendants to file their Opposition to Plaintiffs' Motion for Award of Attorneys' Fees and Costs and the deadline for Defendants to file their Statement of Non-opposition to Plaintiffs' Motion for Final Approval of Class Action Settlement are hereby extended to August 29, 2017. The deadline for Plaintiffs to file their Reply Brief to Plaintiffs' Motion for Award of Attorneys' Fees and Costs is hereby extended to September 15, 2017.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: August 9, 2017, 2017


THE HONORABLE JON S. TIGAR