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21 Attorneys for Defendants

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

24 JUAN M. REYES, SALVATORE
 25 TAGLIARENI, ANGEL DE LA CRUZ,
 26 ANTONIO MEROLLA, SMAIL MUSOVIC,
 27 TESFAYE GHEBREMEDHIN, PHILIP
 28 ROGERS, ALMOND REID, CARMELO
 CALABRO, RUSSELL NEUBERT, and
 JOHN WILLIAMS, individually and as
 representatives on behalf of a class of similarly
 situated persons,

Plaintiffs,

v.

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

Defendants.

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

**JOINT STIPULATION TO STAY ALL
 PRETRIAL AND TRIAL DEADLINES
 AND FOR A SCHEDULING ORDER
 FOR PRELIMINARY APPROVAL OF
 A SETTLEMENT AGREEMENT; AND
 [PROPOSED] ORDER**

The Honorable Jon S. Tigar

1 **JOINT STIPULATION**

2 The parties have reached an agreement in principle to settle this case. Pursuant to Local
3 Rule 6-2(a), Plaintiffs and Defendants hereby stipulate and request the Court to enter an order
4 staying the case and all its deadlines pending further order by the Court, and to set a deadline of
5 August 4, 2016 by which Plaintiffs may file a motion for preliminary approval of the settlement.
6 In support of this request, the parties state as follows:

7 1. The parties have reached a proposed classwide settlement of the case after
8 engaging in a day-long mediation facilitated by a JAMS mediator, Jed D. Melnick. While the
9 parties have agreed in principle on the terms of the proposed settlement, there is substantial work
10 yet to be done to reduce those terms to a final written class settlement agreement and to prepare
11 the materials required to initiate the class action settlement approval process pursuant to Federal
12 Rule of Civil Procedure 23(e).

13 2. The requested stay will permit the parties to focus their efforts, resources, and
14 attention on concluding the settlement process. The stay will also save the parties considerable
15 time and expense of continuing litigation of a case the parties have agreed to settle.

16 3. Consistent with the local rules, previous time modifications in this case are set
17 forth in the accompanying declaration as is a description of the effect of the requested time
18 modification.

19 WHEREFORE, Plaintiffs and Defendants jointly request that the Court grant their request
20 for a stay of all pretrial and trial deadlines and for an order providing that Plaintiffs may file a
21 motion for preliminary approval of the settlement on or before August 4, 2016.

22
23 Dated: June 3, 2016

24 ABBEY SPANIER LLP
25 FRUMKIN & HUNTER LLP
26 LAW OFFICE OF GEOFFREY V. WHITE
27 SINCLAIR LAW FIRM

28 By: /s/ Judith L. Spanier
(with authorization by email on June 3, 2016)

WILLIAM D. FRUMKIN (admitted pro hac vice)
ELIZABETH E. HUNTER (admitted pro hac vice)
NANCY KABOOLIAN (pro hac vice to be filed)


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THOMAS O. SINCLAIR (*admitted pro hac vice*)
JUDITH L. SPANIER (*admitted pro hac vice*)
GEOFFREY V. WHITE

Dated: June 3, 2016

Attorneys for Plaintiff
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By:


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CONCEPCIÓN E. LOZANO-BATISTA
EMILY P. RICH

Attorneys for Defendants

~~PROPOSED~~ ORDER

The parties' Joint Stipulation to Stay All Pretrial and Trial Deadlines and for a Scheduling Order for Preliminary Approval of a Settlement Agreement is GRANTED. The case and all its deadlines are hereby STAYED with the exception that Plaintiffs shall file their motion for preliminary approval of the settlement agreement on or before August 4, 2016.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 7, 2016


THE HONORABLE JON S. TIGAR