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16 Attorneys for Plaintiff, Thomas E. Perez, Secretary  
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18 UNITED STATES DISTRICT COURT FOR THE  
 19 NORTHERN DISTRICT OF CALIFORNIA  
 20 SAN FRANCISCO DIVISION

21	<b>THOMAS E. PEREZ</b> , Secretary of Labor,	)	Case No.: 3:15-cv-1026-WHA
22	United States Department of Labor,	)	
23		)	<b>STIPULATION AND <del>PROPOSED</del></b>
24	Plaintiff,	)	<b>ORDER TO CONTINUE PRELIMINARY</b>
25	v.	)	<b>INJUNCTION HEARING DATE</b>
26		)	
27	<b>NATIONAL CONSOLIDATED</b>	)	
28	<b>COURIERS, INC.</b> , a corporation, and	)	
	<b>TANWEER AHMED</b> , an individual,	)	
		)	
	Defendants.	)	
		)	
		)	
		)	

29 On June 9, 2015, at a court-ordered settlement conference before Magistrate Judge Elizabeth  
 30 Laporte, Plaintiff Secretary of Labor and Defendants National Consolidated Couriers, Inc. and Tanweer  
 31 Ahmed (collectively, “the parties”) agreed to a settlement in principle. The Secretary is currently

1 finalizing a proposed consent judgment to be exchanged with Defendants. Defendants consider the  
2 resolution of the pending contempt proceeding to be a material term of the settlement, and represent  
3 that requiring Defendants to proceed with the contempt proceeding runs the risk of undermining the  
4 parties' agreement. To allow adequate time to negotiate the language of the consent judgment, the  
5 parties hereby stipulate and jointly request that the Court continue the preliminary injunction hearing  
6 currently calendared for June 19, 2015 at 8:00 a.m. three weeks.<sup>1</sup>

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8 Agreed:

9 M. PATRICIA SMITH  
10 Solicitor of Labor

11 JANET M. HEROLD  
12 Regional Solicitor

13 SUSAN SELETSKY  
14 Counsel for FLSA

14 /s/ Ronald Arena (as authorized 6/17/2015)  
15 RONALD ARENA  
16 ARENA HOFFMAN LLP  
17 Attorneys for Defendants

/s/ Benjamin Botts  
18 BENJAMIN BOTTS  
19 NATALIE NARDECCHIA  
20 ANDREW SCHULTZ  
21 Trial Attorneys  
22 Attorneys for Plaintiff

19 Dated: June 17, 2015

Dated: June 17, 2015


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27 <sup>1</sup> The consent judgment and concurrently filed complaint will be a separate case, but the parties intend  
28 to file a joint administrative motion under Civ. L.R. 3-12 requesting that the Court treat the new case as  
related to the present matter.

1 **[PROPOSED] ORDER**

2 PURSUANT TO STIPULATION, the preliminary injunction hearing calendared for June 19,  
3 2015 at 8:00 a.m. is continued until July 16, 2015 at 8 a.m. / ~~p.m.~~

4 IT IS SO ORDERED.

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6 Dated: June 17, 2015.

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9 WILLIAM ALSUP  
10 UNITED STATES DISTRICT JUDGE  
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