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20 GLOBAL MARKETING RESEARCH  
21 SERVICES, INC.

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

24 NICOLE ZILVETI,

25 Plaintiff,

26 v.

27 GLOBAL MARKETING RESEARCH  
28 SERVICES, INC.

Defendant.

Case No. 3:15-cv-15-2494-MMC

**JOINT STIPULATION TO STAY ALL  
LITIGATION DEADLINES; [PROPOSED]  
ORDER**

Courtroom: 7  
Judge: Maxine M. Chesney  
Complaint Filed: June 4, 2015  
Trial Date: None set

29 The following is a stipulation by and between Defendant GLOBAL MARKETING  
30 RESEARCH SERVICES, INC. (“Defendant” or “GMRS”) and Plaintiff NICOLE ZILVETI  
31 (“Plaintiff” or “Zilveti”) and their attorneys of record, as follows:

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1           WHEREAS, the Parties reached a Stipulation of Settlement (“Settlement Agreement”) in  
2 the related matter of *Martin, et al. v. Global Marketing Research Services, Inc.*, Case No. 6:14-  
3 cv-1290-ORL-31-KRS (M.D. FL) (the “*Martin* litigation”), which would resolve this California  
4 litigation, and submitted their proposed Settlement Agreement for approval by the court in the  
5 *Martin* litigation on March 18, 2016 (*Martin* Dkt. 97-1);

6           WHEREAS, the *Martin* court issued its Order granting Preliminary Settlement Approval  
7 on March 29, 2016 (*Martin* Dkt. 98) and set the Final Approval Hearing for August 16, 2016;

8           WHEREAS, on August 16, 2016, at the Final Approval Hearing in the *Martin* litigation,  
9 the *Martin* court heard argument regarding the fairness, reasonableness, and adequacy of the  
10 Settlement Agreement and held an evidentiary hearing for the related matter of attorney’s fees.  
11 At the close of the hearing, the *Martin* court advised it would not issue its final ruling until the  
12 finality of the claims process and ordered the Parties to submit a final claims count following the  
13 expiration of the claims deadline;

14           WHEREAS the claims deadline has now passed, the Parties submitted a final claims  
15 count to the *Martin* court on October 28, 2016, and the Parties believe that the *Martin* court will  
16 approve the Settlement Agreement at some point within the next several weeks;

17           WHEREAS, once the *Martin* court approves the Settlement Agreement, the claims in this  
18 case will also be resolved, and the Parties will thereafter submit a Stipulation of Dismissal of this  
19 California litigation;

20           WHEREAS, the Parties filed Joint Stipulations to Stay All Litigation Deadlines in the  
21 California litigation on April 1, 2016 and August 31, 2016 (*Zilveti* Dkt. 52, 54), which this Court  
22 granted on April 4, 2016 and September 1, 2016, respectively (*Zilveti* Dkt. 53, 55);

23           WHEREAS, the Parties are in agreement and believe there is good cause to extend the  
24 stay of all litigation deadlines in this instant action, pending the *Martin* court’s entry of its Final  
25 Settlement Approval Order, after which time the Parties shall file a stipulation to dismiss this  
26 case in its entirety; and

27           WHEREAS, the Parties agree to promptly apprise this Court if entry of the final order is  
28 continued or not granted for any reason;

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1                   **IT IS HEREBY AGREED AND STIPULATED** by the parties that all litigation  
2 deadlines be stayed until no earlier than November 30, 2016, pending the *Martin* court's entry of  
3 its Final Settlement Approval Order and anticipated dismissal of this California action.

4   O'CONNOR LAW

5  
6 DATED: October 31, 2016

7 By: /s/ Steven L. Woodrow  
8                   Matthew J. O'Connor, Esq.  
9                   Counsel for Plaintiff

10    WOODROW & PELUSO, LLC

11 DATED: October 31, 2016

12 By: /s/ Steven L. Woodrow  
13                   Steven L. Woodrow, Esq.  
14                   Patrick H. Peluso, Esq.  
15                   *Pro Hac Vice* Counsel for Plaintiff

16    KLINEDINST PC

17 DATED: October 31, 2016

18 By: /s/ Ian A. Rambarran  
19                   Ian A. Rambarran  
20                   Diana N. Chinn  
21                   Attorneys for Defendant  
22                   GLOBAL MARKETING RESEARCH  
23                   SERVICES, INC.

24    SCHWARTZ LAW GROUP

25 DATED: October 31, 2016

26 By: /s/ Steven G. Schwartz  
27                   Steven G. Schwartz (admitted *pro hac vice*)  
28                   David J. Pascuzzi (admitted *pro hac vice*)  
                    Attorneys for Defendant  
                    GLOBAL MARKETING RESEARCH  
                    SERVICES, INC.

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**ATTESTATION**

In compliance with Federal Rule 5, Local Rule 5-1(i)(3), the filer of this document hereby attests that the concurrence to the filing of this document has been obtained from the other signatories thereto.

/s/ Diana N. Chinn

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**[PROPOSED] ORDER**

**IT IS HEREBY ORDERED** that all litigation deadlines be stayed until November 30, 2016, pending the *Martin* court's entry of its Final Order in the related matter, *Martin, et al. v. Global Marketing Research Services, Inc.*, Case No. 6:14-cv-1290-ORL-31-KRS (M.D. FL), and dismissal of this California action.

**IT IS FURTHER ORDERED THAT**, if a notice of dismissal has not been filed by November 30, 2016, the Parties shall apprise the Court as to the status of the settlement.

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**IT IS SO ORDERED.**

DATED: November 2, 2016

  
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THE HONORABLE MAXINE M. CHESNEY  
United States District Judge

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