| 1  | DAVID F. MCDOWELL (CA SBN 125806  | j)   |  |  |
|----|---|--|--|--|
| 2  | DMcDowell@mofo.com<br>MORRISON & FOERSTER LLP                             |  |  |  |
| 3  | 707 Wilshire Boulevard<br>Los Angeles, California 90017-3543              |  |  |  |
| 4  | Telephone: 213.892.5200<br>Facsimile: 213.892.5454                        |  |  |  |
| 5  | TIFFANY CHEUNG (CA SBN 211497)  |  |  |  |
| 6  | TCheung@mofo.com<br>ALEXANDRA E. LAKS (CA SBN 291861                      | )  |  |  |
| 7  | ALaks@mofo.com<br>MORRISON & FOERSTER LLP                                 |  |  |  |
| 8  | 425 Market Street<br>San Francisco, California 94105-2482                 |  |  |  |
| 9  | Telephone: 415.268.7000<br>Facsimile: 415.268.7522                        |  |  |  |
| 10 | Attorneys for Defendant<br>SEAGATE TECHNOLOGY LLC                         |  |  |  |
| 11 | SEAGATE TECHNOLOGT ELC  |  |  |  |
| 12 | UNITED STATES DISTRICT COURT  |  |  |  |
| 13 | NORTHERN DISTRICT OF CALIFORNIA   |  |  |  |
| 14 | SAN FRANCISCO DIVISION  |  |  |  |
| 15 |   |  |  |  |
| 16 | EVERETT CASTILLO, LINDA<br>CASTILLO, NICHOLAS DATTOMA,                    | Case No.: 3:16-cv-01958-RS                                 |  |  |
| 17 | FREDA LANG, WENDY TRAN, and   | JOINT CASE MANAGEMENT<br>STATEMENT, STIPULATION, AND       |  |  |
| 18 | STEVEN WILK, individually and on behalf of all others similarly situated, | [PROPOSED] ORDER TO CONTINUE<br>CASE MANAGEMENT CONFERENCE |  |  |
| 19 | Plaintiffs,   | Judge: Hon. Richard Seeborg                                |  |  |
| 20 | V.  | Action Filed: April 14, 2016                               |  |  |
| 21 | SEAGATE TECHNOLOGY LLC,   |  |  |  |
| 22 | Defendant.  |  |  |  |
| 23 |   |  |  |  |
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| 28 | JOINT CASE MANAGEMENT STATEMENT, STIPULATION                              | , AND [PROPOSED] ORDER TO CONTINUE CASE                    |  |  |
|    | MANAGEMENT CONFERENCE<br>CASE No. 3:16-CV-01958-RS<br>sf-3769809          |  |  |  |

| 1  |   |  |  |  |
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| 1  | Pursuant to Local Rule 16-10(d), the parties hereby submit the following Joint Case   |  |  |  |
| 2  | Management Statement.   |  |  |  |
| 3  | Plaintiffs Everett Castillo, Linda Castillo, Nicholas Dattoma, Freda Lang, Wendy Tran   |  |  |  |
| 4  | and Steven Wilk, on behalf of themselves and all others similarly situated, and Defendant Seagate   |  |  |  |
| 5  | Technology LLC, by and through their respective counsel of record, have entered into a  |  |  |  |
| 6  | memorandum of understanding regarding the settlement of this action on a class-wide basis. The  |  |  |  |
| 7  | parties are close to finalizing the required settlement documentation. They expect to reach a final,  |  |  |  |
| 8  | executed agreement by the end of May, and Plaintiffs will file their motion for preliminary   |  |  |  |
| 9  | approval shortly.   |  |  |  |
| 10 | The parties respectfully request that the Court continue the May 25, 2017 case  |  |  |  |
| 11 | management conference to June 29, 2017 to allow the parties to finalize this settlement, and so   |  |  |  |
| 12 | that the parties and the Court can discuss Plaintiffs' motion for preliminary approval at that time.  |  |  |  |
| 13 |   |  |  |  |
| 14 | Respectfully submitted,   |  |  |  |
| 15 | Dated: May 18, 2017   |  |  |  |
| 16 | By: <u>/s/ Tiffany Cheung</u>   |  |  |  |
| 17 | MORRISON & FOERSTER LLP<br>Tiffany Cheung   |  |  |  |
| 18 | Alexandra E. Laks<br>425 Market Street  |  |  |  |
| 19 | San Francisco, California 94105-2482<br>Telephone: (415) 268-7000   |  |  |  |
| 20 | Facsimile: (415) 268-7522<br>TCheung@mofo.com   |  |  |  |
| 21 | ALaks@mofo.com  |  |  |  |
| 22 | MORRISON & FOERSTER LLP<br>David F. McDowell  |  |  |  |
| 23 | 707 Wilshire Boulevard<br>Los Angeles, California 90017-3543<br>Talaphana: 213 802 5200   |  |  |  |
| 24 | Telephone: 213.892.5200<br>Facsimile: 213.892.5454  |  |  |  |
| 25 | DMcDowell@mofo.com  |  |  |  |
| 26 | Attorneys for Defendant<br>SEAGATE TECHNOLOGY LLC   |  |  |  |
| 27 |   |  |  |  |
| 28 |   |  |  |  |
| I  | <sup>  </sup> JOINT CASE MANAGEMENT STATEMENT, STIPULATION, AND [PROPOSED] ORDER TO CONTINUE CASE<br>MANAGEMENT CONFERENCE<br>CASE NO. 3:16-CV-01958-RS<br>sf-3769809 |  |  |  |

| 1  | Dated: May 18, 2017  |  |
|----|--|--|
| 2  |  | By: <u>/s/ Eric A. Grover</u>  |
| 3  |  | <b>KELLER GROVER LLP</b><br>Eric A. Grover                             |
| 4  |  | 1965 Market Street<br>San Francisco, CA 94103                          |
| 5  |  | Telephone: (415) 543-1305<br>Facsimile: (415) 543-7861                 |
| 6  |  | eagrover@kellergrover.com  |
| 7  |  | FINKELSTEIN, BLANKINSHIP,<br>FREIPEARSON & GARBER, LLP                 |
| 8  |  | Jeremiah Frei-Pearson (Pro Hac Vice)<br>445 Hamilton Avenue, Suite 605 |
| 9  |  | White Plains, NY 10601<br>Telephone: (914) 298-3281                    |
| 10 |  | Facsimile: (914) 908-6709<br>jfrei-pearson@fbfglaw.com                 |
| 11 |  | Attorneys for Plaintiffs   |
| 12 |  | NICHOLAS DATTOMA, FREDA LANG,<br>STEVEN WILK, AND THE CLASS            |
| 13 |  | GLANCY PRONGAY & MURRAY LLP<br>Lionel Z. Glancy                        |
| 14 |  | Marc L. Godino<br>Mark S. Greenstone                                   |
| 15 |  | 1925 Century Park East, Suite 2100                                     |
| 16 |  | Los Angeles, CA 90067<br>Telephone: (310) 201-9150                     |
| 17 |  | Facsimile: (310) 201-9160<br>info@glancylaw.com                        |
| 18 |  | BRAGAR EAGEL & SQUIRE, P.C.  |
| 19 |  | David J. Stone (Pro Hac Vice)<br>Jeffrey H. Squire (Pro Hac Vice)      |
| 20 |  | Lawrence P. Eagel (Pro Hac Vice)<br>885 Third Avenue, Suite 3040       |
| 21 |  | New York, NY 10022<br>Telephone: (212) 308-5858                        |
| 22 |  | Facsimile: (212) 486-0462<br>stone@bespc.com                           |
| 23 |  | squire@bespc.com<br>eagel@bespc.com                                    |
| 24 |  | Attorneys for Plaintiffs   |
| 25 |  | EVERETT CASTILLO, LINDA CASTILLO,<br>WENDY TRAN, AND THE CLASS         |
| 26 |  |  |
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| I  | JOINT CASE MANAGEMENT STATEMENT, STIPULATION<br>MANAGEMENT CONFERENCE<br>CASE NO. 3:16-CV-01958-RS<br>sf-3769809 | , AND [PROPOSED] ORDER TO CONTINUE CASE                                |

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| 1        | ECF ATTESTATION   |  |  |
|----------|---|--|--|
| 2        | I, Tiffany Cheung, am the ECF User whose ID and password are being used to file the   |  |  |
| 3        | following JOINT CASE MANAGEMENT STATEMENT, STIPULATION, AND [PROPOSED]  |  |  |
| 4        | ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE. In compliance with Local  |  |  |
| 5        | Rule 5-1(i)(3), I hereby attest that Eric A. Grover has concurred in this filing.   |  |  |
| 6        | Dated: May 18, 2017 MORRISON & FOERSTER LLP   |  |  |
| 7        |   |  |  |
| 8        | By: <u>/s/ Tiffany Cheung</u>   |  |  |
| 9        | Tiffany Cheung<br>425 Market Street   |  |  |
| 10       | San Francisco, California 94105-2482<br>Telephone: (415) 268-7000   |  |  |
| 11       | Facsimile: (415) 268-7522<br>TCheung@mofo.com   |  |  |
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| 17       | [PROPOSED] ORDER  |  |  |
| 18       | PURSUANT TO STIPULATION, IT IS SO ORDERED.  |  |  |
| 19       | Dated: <u>May 19</u> , 2017   |  |  |
| 20       | This Section  |  |  |
| 21       | HON. RICHARD SEEBO  |  |  |
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|          | JOINT CASE MANAGEMENT STATEMENT, STIPULATION, AND [PROPOSED] ORDER TO CONTINUE CASE<br>MANAGEMENT CONFERENCE<br>CASE NO. 3:16-CV-01958-RS |  |  |

s\$<del>1</del>33609809