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   Attorneys for Defendants
14 AKVARR, INC. and VIJAI RANGARAJAN
   (incorrectly sued herein as "VIJAI
15 RANGARAJAN RANGARAJAN")

16
                UNITED STATES DISTRICT COURT
17
              NORTHERN DISTRICT OF CALIFORNIA
18

19

20 RANDAL SINGH GOOMER, an | **Case No. 3:18-CV-02519-JST**
   individual,
21 | **STIPULATION TO WITHDRAW**
              Plaintiff, | **UNOPPOSED MOTION FOR**
22 | **APPROVAL OF PAGA SETTLEMENT**
   v.
23 | Date: June 6, 2019
   AKVARR, INC., a Delaware corporation; | Time: 2:00 p.m.
24 VIJAI RANGARAJAN RANGARAJAN, an | Courtroom: 9
   individual | Judge: The Hon. Jon S. Tigar
25
              Defendants.
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4841-0202-1782.1   1

STIPULATION TO WITHDRAW UNOPPOSED MOTION
FOR APPROVAL OF PAGA SETTLEMENT   **Case No. 3:18-CV-02519-JST**

1   Plaintiff RANDAL GOOMER, by and through his attorney of record, Berman North

2 LLP, desires to withdraw Plaintiff's Unopposed Motion for Approval of PAGA Settlement (the

3 "Motion"), and Defendants AKVARR, INC. and VIJAI RANGARAJAN, by and through their

4 counsel of record, Lewis Brisbois Bisgaard & Smith LLP, consent to the withdrawal

5   WHEREAS, on February 19, 2019, Plaintiff filed the Motion with a noticed hearing date

6 of March 28, 2019.

7   WHEREAS, on April 19, 2019, the Court continued the hearing. The hearing on the

8 Motion is presently set for June 6, 2019 at 2:00 p.m. in San Francisco, Courtroom 9, 19th Floor

9 before Judge Jon S. Tigar.

10   WHERAS, on April 24, 2019, the Court requested Supplemental Briefing.

11   WHERAS, the parties are in the process of negotiating a settlement to include a dismissal

12 without prejudice of the PAGA claim, and a release of the remaining, non-PAGA related claims

13 for which no Court approval is requested.

14   WHEREAS, Plaintiff desires to withdraw his Unopposed Motion for Approval of PAGA

15 Settlement, and Defendants consent to the withdrawal.

16   NOW, THEREFORE, by and through their undersigned counsel of record, Plaintiff and

17 Defendants hereby stipulate to the following:

18   Plaintiff's Unopposed Motion for Approval of PAGA Settlement is withdrawn, and the

19 hearing on Plaintiff's Unopposed Motion for Approval of PAGA Settlement, currently scheduled

20 for June 6, 2019 at 2:00 p.m., shall be vacated.

21

22   Respectfully submitted,

23

24 Dated: May 8, 2019   BERMAN NORTH LLP

25

                                        By: /s/ Stacy North
26   Stacy North
                                              Attorneys for Plaintiff
27   RANDAL SINGH GOOMER

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4841-0202-1782.1   2

STIPULATION TO WITHDRAW UNOPPOSED MOTION
FOR APPROVAL OF PAGA SETTLEMENT   **Case No. 3:18-CV-02519-JST**

Dated: May 8, 2019   LEWIS BRISBOIS BISGAARD & SMITH LLP

                                            By: /s/ Jonathan D. Martin
                                                  Jonathan D. Martin
                                                  Attorneys for Defendants
                                                  AKVARR, INC. AND VIJAI
                                                  RANGARAJAN (INCORRECTLY SUED
                                                  HEREIN AS "VIJAI RANGARAJAN
                                                  RANGARAJAN")

                                ATTESTATION

        Concurrence in the filing of this document has been obtained from each of the

individual(s) whose electronic signature is attributed above.

Dated: May 8, 2019   /s/ Stacy North
                                                Stacy North
                                                Attorneys for Plaintiff
                                                RANDAL SINGH GOOMER

                                  <u>ORDER</u>

        IT IS SO ORDERED, based on the Stipulation set forth above, and GOOD CAUSE

APPEARING, that:

        Plaintiff's Unopposed Motion for Approval of PAGA Settlement is withdrawn, and the

hearing on Plaintiff's Unopposed Motion for Approval of PAGA Settlement currently scheduled

for June 6, 2019 at 2:00 p.m. shall be vacated.

IT IS SO ORDERED.

Dated: May 9,   2019   _____
                                        UNITED STATES DISTRICT JUDGE
                                        HON. JON S. TIGAR

STIPULATION TO WITHDRAW UNOPPOSED MOTION
FOR APPROVAL OF PAGA SETTLEMENT   Case No. 3:18-CV-02519-JST