o et al v. e	Bay, Inc. et al		Doc.
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1	STROOCK & STROOCK & LAVAN LLP		
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5	Email: <i>lacalendar@stroock.com</i>		
6	Attorneys for Defendant PAYPAL, INC.		
7			
8	UNITED STAT	FES DISTRICT COURT	
9	NORTHERN DISTRICT OF	CALIFORNIA – OAKLAND BRANCH	
10	MOISES ZEPEDA, MICHAEL SPEAR,) Case No. 10-CV-02500 SBA	
11	RONYA OSMAN, BRIAN PATTEE, CASEY CHING, DENAE ZAMORA,)) STIPULATION AND [PROPOSED]	
12	MICHAEL LAVANGA, and GARY MILLER, on behalf of themselves and all	 ORDER CONTINUING DATE TO FILE MOTION FOR PRELIMINARY 	
13	others similarly situated,) APPROVAL	
14	Plaintiffs,	ý)	
15	V.	Action Filed: June 7, 2010	
16	PAYPAL, INC., a Delaware Corporation,		
	Defendant.)	
17)	
18	DEVINDA FERNANDO, VADIM TSIGEL, MICHAIL ZINGER, AMY) Case No. 10-CV-01668 SBA	
19	RICKEL, FRED RICKEL, IRA GILMAN, LACY REINTSMA, and SHAUL BEHR) STIPULATION AND [PPROPROSED]) ORDER CONTINUING DATE TO FILE	
20	on behalf of themselves and all others similarly situated,) MOTION FOR PRELIMINARY) APPROVAL	
21	Plaintiffs,)	
22))) Action Eilade June 7, 2010	
23	V.) Action Filed: June 7, 2010	
24	PAYPAL, INC., a Delaware Corporation,)	
25	Defendant.)	
26			
27			
28			
-	STIPULATION AND [PROPOSED] ORDER R	E DATE TO FILE MOTION FOR PRELIMINARY APPROY CASE NO. 10-CV-02500	
	CASE NO. 10-CV-01668 SBA		
	LA 51531006	Dockets.Ju	ustia.co
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1	Defendant PayPal, Inc. and plaintiffs Moises Zepeda, Michael Spear, Ronya Osman, Brian
2	Pattee, Casey Ching, Denae Zamora, Michael Lavanga, Gary Miller, Devinda Fernando, Vadim
3	Tsigel, Michail Zinger, Amy Rickel, Fred Rickel, Ira Gilman, Lacy Reinstma and Shaul Behr
4	(collectively, the "Parties") hereby submit this Stipulation for an Order to continue the date to file a
5	motion for preliminary approval of settlement, which is currently due on May 8, 2012.
6	WHEREAS, a Case Management Conference was held on April 19, 2012, at which the
7	Parties advised the Court that the Parties have reached a tentative agreement to settle the above-
8	captioned actions on a class-action basis and are currently in the process of drafting a written
9	settlement agreement and exhibits, including proposed notice to the class;
10	WHEREAS, at the Case Management Conference, the Court set a hearing on a motion for
11	preliminary approval on June 12, 2012, with the motion for preliminary approval to be filed by
12	May 8, 2012;
13	WHEREAS, the Parties require additional time to complete the drafting of the settlement
14	agreement and exhibits;
15	WHEREAS, this Stipulation is made in good faith and not for purposes of delay;
16	IT IS HEREBY STIPULATED, by and between the Parties, through their respective
17	counsel of record, that the date to file a motion for preliminary approval of settlement shall be
18	continued from May 8, 2012 to May 15, 2012.
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	STIPULATION AND [PROPOSED] ORDER RE DATE TO FILE MOTION FOR PRELIMINARY APPROVAL CASE NO. 10-CV-02500 SBA
	CASE NO. 10-CV-01668 SBA LA 51531006

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1	Dated: May 8, 2012	Respectfully submitted,
2		STROOCK & STROOCK & LAVAN LLP JULIA B. STRICKLAND
3		DAVID W. MOON BENJAMIN T. POTTER
5		
6		By: <u>/s/ David W. Moon</u> David W. Moon
7		Attorneys for Defendant PAYPAL, INC.
8		, , , , , , , , , ,
9	Dated: May 8, 2012	LEXINGTON LAW GROUP
10		By: /s/ Mark M. Todzo
11		Mark M. Todzo
12		Attorneys for Plaintiffs MOISES ZEPEDA, MICHAEL SPEAR, RONYA
13		OSMAN, BRIAN PATTEE, CASEY CHING, DENAE ZAMORA, MICHAEL LAVANGA
14		AND GARY MILLER
15 16	Dated: May 8, 2012	LAW OFFICES OF MARINA TRUBITSKY, PC
10		By: /s/ Marina Trubitsky
18		Marina Trubitsky
10		Attorneys for Plaintiffs DEVINDA FERNANDO, VADIM TSIGEL,
20		MICHAIL ZINGER, AMY RICKEL, FRED RICKEL, IRA GILMAN, LACY REINTSMA,
21		AND SHAUL BEHR
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	STIPULATION AND [PROPOSED] ORDEF	R RE DATE TO FILE MOTION FOR PRELIMINARY APPROVAL CASE NO. 10-CV-02500 SBA CASE NO. 10-CV-01668 SBA

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1	<u> XRRØPOSEDKORDER</u>
2	PURSUANT TO THE STIPULATION, IT IS SO ORDERED.
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4	Dated: Dated B. Crossing
5	HON. SAUNDRA BROWN ARMSTRONG UNITED STATES DISTRICT JUDGE
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	STIPULATION AND [PROPOSED] ORDER RE DATE TO FILE MOTION FOR PRELIMINARY APPROVAL CASE NO. 10-CV-02500 SBA CASE NO. 10-CV-01668 SBA LA 51531006

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1	CERTIFICATE OF SERVICE
2	I hereby certify that, on May 8, 2012, I electronically filed the foregoing document with the
3	Clerk of the Court using the CM/ECF system. The Court or the CM/ECF system will send
4	notification of such filings to all CM/ECF participants.
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7	/s/ David W. Moon David W. Moon
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28	- 4 - STIPULATION AND [PROPOSED] ORDER RE DATE TO FILE MOTION FOR PRELIMINARY APPROVAL
	CASE NO. 10-CV-01668 SBA LA 51531006