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 7 PAYPAL, INC.

8 **UNITED STATES 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, )  
 12 CASEY CHING, DENAE ZAMORA, ) **STIPULATION AND [PROPOSED]**  
 MICHAEL LAVANGA, and GARY ) **ORDER CONTINUING DATE TO FILE**  
 13 MILLER, on behalf of themselves and all ) **MOTION FOR PRELIMINARY**  
 others similarly situated, ) **APPROVAL**  
 14 )  
 Plaintiffs, )  
 15 )  
 v. ) Action Filed: June 7, 2010  
 16 )  
 PAYPAL, INC., a Delaware Corporation, )  
 17 )  
 Defendant. )

18 DEVINDA FERNANDO, VADIM ) Case No. 10-CV-01668 SBA  
 19 TSIGEL, MICHAEL ZINGER, AMY )  
 20 RICKEL, FRED RICKEL, IRA GILMAN, ) **STIPULATION AND [PROPOSED]**  
 LACY REINTSMA, and SHAUL BEHR ) **ORDER CONTINUING DATE TO FILE**  
 21 on behalf of themselves and all others ) **MOTION FOR PRELIMINARY**  
 similarly situated, ) **APPROVAL**  
 22 )  
 Plaintiffs, )  
 23 )  
 v. ) Action Filed: June 7, 2010  
 24 )  
 PAYPAL, INC., a Delaware Corporation, )  
 25 )  
 Defendant. )

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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

1 Defendant PayPal, Inc. and plaintiffs Moises Zepeda, Michael Spear, Ronya Osman, Brian  
2 Pattee, Casey Ching, Dena 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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~~PROPOSED~~ ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: 5/10/12

  
HON. SAUNDRA BROWN ARMSTRONG  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that, on May 8, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. The Court or the CM/ECF system will send notification of such filings to all CM/ECF participants.

/s/ David W. Moon

David W. Moon