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7 Attorneys for Defendant
 LeadClick Media, Inc.

8
 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 OAKLAND DIVISION

12 CHRISTOPHER KRAMER, individually
 13 and on behalf of all others similarly
 14 situated,

15 Plaintiff,

16 v.

17 AUTOBYTEL, INC., a Delaware
 18 corporation; B2MOBILE, LLC, a
 19 California limited liability company; and
 20 LEADCLICK MEDIA, INC., a California
 corporation,

21 Defendants.

Case No. C10-02722-CW

**NOTICE OF PENDING CLASS
 ACTION SETTLEMENT AND
 JOINT STIPULATION AND ORDER
 TO VACATE DATES ON CASE
 MANAGEMENT ORDER**

Honorable Claudia Wilken, Ctrm. 2

Complaint Filed: November 17, 2009

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REED SMITH LLP
 A limited liability partnership formed in the State of Delaware

1 Plaintiff Christopher Kramer, (“Plaintiff” or “Kramer”) and Defendants
2 B2Mobile, LLC (“B2M”) and LeadClick Media, Inc. (“LeadClick”) (collectively
3 referred to as the “Parties”) enter into this joint stipulation with reference to the
4 following facts:

5 **RECITALS**

6 A. WHEREAS the Court’s Minute Order and Case Management Order
7 entered on January 4, 2011, sets forth a number of dates and deadlines, including a
8 deadline for completion of private mediation on March 31, 2011;

9 B. WHEREAS on March 29, 2011, the Parties participated in a day-long
10 mediation conducted by Professor Eric D. Green of Resolutions, LLC;

11 C. WHEREAS the Parties reached a proposed settlement during the
12 mediation with the assistance of Professor Green;

13 D. WHEREAS the Parties need sufficient time to finalize settlement
14 agreements;

15 E. WHEREAS the Plaintiff needs sufficient time to prepare and file a
16 motion for preliminary approval of the class action settlement; and

17 F. WHEREAS the Parties would like the remaining dates in the Court’s
18 January 4, 2011, Court’s Minute Order and Case Management Order vacated in order
19 to have sufficient time to finalize the settlement documents and for Plaintiff to seek
20 the Court’s preliminary approval of the class action settlement.

21
22 **STIPULATION**

23 **NOW, THEREFORE**, it is hereby stipulated by the parties, through their
24 respective counsel of record, as follows:

- 25 1. The Parties will finalize settlement agreements within 45 days;
26 2. The Plaintiff will prepare and file a motion for preliminary approval of
27 the class action settlement within 60 days;

1 3. The Parties request that the Court vacate the remaining dates and
2 deadlines in the Minute Order and Case Management Order entered on January 4,
3 2011; and

4 4. If for any reason the Court does not approve the class action settlement,
5 any party may request that the Court reset the remaining dates and deadlines in the
6 Minute Order and Case Management Order entered on January 4, 2011.

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8 **IT IS SO STIPULATED.**

9
10 DATED: March 31, 2011.

EDELSON McGUIRE, LLC

11
12 By _____ / S / Ryan D. Andrews

13 Christopher Dore
14 Michael J. McMorrow
15 Ryan D. Andrews
16 Sean Reis
17 Attorneys for Plaintiff
18 Christopher Kramer

19
20 DATED: March 31, 2011.

SUMMIT LAW GROUP PLLC

21
22 By _____ / S / Philip S. McCune

23 Philip S. McCune
24 Molly A. Terwilliger
25 Attorneys for Defendant
26 B2Mobile, LLC

27
28 DATED: March 31, 2011.

HANSON BRIDGETT LLP

By _____ / S / Arman Javid

Arman Javid
Raymond F. Lynch
Megan Oliver Thompson
Attorneys for Defendant
B2Mobile, LLC

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DATED: March 31, 2011.

REED SMITH LLP

By / S / Roxanne M. Wilson
Roxanne M. Wilson
Attorneys for Defendant
LeadClick Media, Inc.

ORDER

Based on the above Stipulation, **IT IS SO ORDERED.** A case management conference will be held on July 26 at 2:00 pm if no motion for preliminary approval has been filed.

DATED: April 5, 2011



The Honorable Claudia Wilken
United States District Court Judge