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[Additional Counsel identified on Signature Page]

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

JUSTIN R. ASTON, and STEVE E. DE
 BORBA, individually and on behalf of all
 similarly-situated current and former employees
 of UNITED PARCEL SERVICE, INC. and
 UPS GROUND FREIGHT, INC.

Plaintiffs,

v.

UNITED PARCEL SERVICE, INC. and UPS
 GROUND FREIGHT, INC.

Defendants.

Case No.: 4:15-cv-02497-JSW

**STIPULATION AND ~~[PROPOSED]~~ ORDER TO
 CONTINUE HEARING AND RELATED
 DEADLINES FOR PLAINTIFFS' MOTION
 FOR CLASS CERTIFICATION**

Courtroom: 5 (2nd Floor)
 Judge: Hon. Jeffrey S. White

TO THE COURT:

By and through their counsel of record, Plaintiffs Justin Aston and Steven E. De Borba (“Plaintiffs”) and United Parcel Service, Inc. and UPS Ground Freight, Inc. (“Defendants”) (collectively “the Parties”) hereby submit the following stipulation:

WHEREAS, the hearing on Plaintiffs’ Motion for Class Certification is currently scheduled for August 19, 2016 at 9:00 a.m.;

WHEREAS, on March 11, 2016, the Parties attended a full-day mediation with mediator David Rotman in San Francisco, California.

WHEREAS, upon the conclusion of the mediation, the Parties agreed to conduct a second mediation with Mr. Rotman, which is presently scheduled for May 31, 2016;

WHEREAS, the Parties agree that in the event that they are unable to settle this case at the mediation, additional time will be needed to complete discovery, including the taking of multiple depositions, related to Plaintiffs’ class action claims prior to filing the motion for class certification and opposition thereto;

THEREFORE, the Parties respectfully request that the Court continue the hearing and the filing deadlines for Plaintiffs’ Motion for Class Certification be at least 30 days from August 19, 2016 to September 23, 2016, or as soon thereafter as convenient for the Court, to allow the Parties time to complete pre-class certification discovery fully and thoroughly in the event that the Parties are unable to reach a settlement at the mediation on May 31, 2016.

Dated: March 25, 2016

GRAHAMHOLLIS APC

By: /s/ Marta Manus
Marta Manus, Esq.
Graham S.P. Hollis, Esq.
Attorneys for Plaintiffs

1 Dated: March 25, 2016

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2 By: /s/ Elizabeth A. Brown

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21 Counsel for Defendants provided authorization on March 25, 2016 to file this stipulation using her
electronic signature.

ORDER

The Court, having reviewed the foregoing Stipulation and good cause appearing therefore, orders as follows:

The hearing on Plaintiffs' Motion for Class Certification currently scheduled for August 19, 2016 is continued to September 23, 2016. The filing deadlines will be pursuant to code.

IT IS SO ORDERED.

Dated: March 28, 2016


Hon. Jeffrey S. White
Judge of the United States District Court