

1 Joseph E. Addiego III (CA SBN 169522)
 John D. Freed (CA SBN 261518)
 2 DAVIS WRIGHT TREMAINE LLP
 505 Montgomery Street, Suite 800
 3 San Francisco, California 94111
 Telephone: (415) 276-6500
 4 Facsimile: (415) 276-6599
 Email: jakefreed@dwt.com
 5 joeaddiego@dwt.com

6 Attorneys for Defendant
 ESSEX PROPERTY TRUST, INC.

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 9 IN THE UNITED STATES DISTRICT COURT
 10 THE NORTHERN DISTRICT OF CALIFORNIA
 11 SAN JOSE DIVISION

12 ANGELE GIROUX,
 13 Plaintiff,
 14 v.
 15 ESSEX PROPERTY TRUST, INC.,
 16 Defendant.
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 18
 19

) Case No. 16-cv-01722-HSG
)
) **STIPULATION AND ORDER**
) **REGARDING EXTENSION TO**
) **DEADLINE FOR SUBMISSION OF**
) **STIPULATED JUDGMENT**
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1 On March 14, 2019, the Court entered its Order Granting Motion for Final Approval of
2 Class Action Settlement and Granting Motion for Class Counsel Attorneys' Fees and Costs ("Final
3 Approval Order"), which directed the parties to file a Stipulated Judgment by March 29, 2019.

4 On or about March 25, 2019, AllClear, the identity theft protection company that had
5 committed to provide the additional identity theft protection contemplated in the settlement
6 approved by the Court, informed Essex it had been acquired by Experian and would not provide
7 those identity theft protection services. The parties immediately responded, and are negotiating an
8 extension of coverage with AllClear and to identify a new service provider of identity theft
9 protection upon the expiration of the AllClear coverage.

10 In order to give the parties time to complete this process and submit a proposal to the Court
11 to address this unanticipated issue, the parties respectfully request that the Court continue the
12 March 29, 2019 deadline to submit the Stipulated Judgment for two weeks, until April 12, 2019.

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IT IS SO STIPULATED.

DATED: April 1, 2019

DAVIS WRIGHT TREMAINE LLP
Joseph E. Addiego III
John D. Freed

By: /s/ Joseph E. Addiego III
Joseph E. Addiego III

Attorneys for Defendant
ESSEX PROPERTY TRUST, INC.

STUTHEIT KALIN LLC
Kyann C. Kalin

By: /s/ Kyann C. Kalin
Kyann C. Kalin

Attorneys for Plaintiff

CERTIFICATION OF CONCURRENCE

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Pursuant to L.R. 5-1, I hereby attest that Kyann C. Kalin, counsel for Plaintiff Angele Giroux, has provided his concurrence in the electronic filing of the foregoing document entitled **STIPULATION AND [PROPOSED] ORDER REGARDING EXTENSION TO DEADLINE FOR SUBMISSION OF STIPULATED JUDGMENT**

/s/ Joseph E. Addiego III

Joseph Addiego III

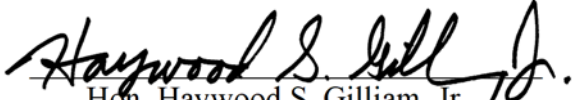
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ORDER

Presently before the Court is the parties' Stipulation [and Proposed Order] Regarding Extension of the Deadline for Submission of a Stipulated Judgment. The deadline is hereby extended until April 12, 2019.

IT IS SO ORDERED.

Date: April 1, 2019


Hon. Haywood S. Gilliam, Jr.
United States District Judge