

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") (Dkt. 80), which directed the parties to file a Stipulated Judgment by March 29,
4 2019.

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

11 On March 29, 2019, in order to give the parties time to complete this process and submit a
12 proposal to the Court to address this unanticipated issue, the parties submitted a Stipulation
13 requesting that the Court continue the March 29, 2019 deadline to submit the Stipulated Judgment
14 for two weeks, until April 12, 2019 (Dkt 81). On April 1, 2019, the Court entered an Order
15 granting the requested continuance to April 12, 2019 (Dkt. 82).

16 Essex secured a one year extension of coverage from AllClear for those class members
17 who were previously enrolled with AllClear, to ensure continuous coverage. The parties have
18 agreed upon a vendor to provide the necessary services for the remainder of the periods identified
19 in the approved settlement. The parties continue to work diligently to finalize the agreement with
20 the new vendor, as well as the logistics of notifying the class and implementing that replacement
21 coverage. The parties request an additional two week extension, to April 26, 2019, to allow
22 sufficient time to complete these tasks before submitting the Stipulated Judgment.

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24 IT IS SO STIPULATED.

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1 DATED: April 15, 2019

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

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

7 Attorneys for Defendant
8 ESSEX PROPERTY TRUST, INC.

9 STUTHEIT KALIN LLC
10 Kyann C. Kalin

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

13 Attorneys for Plaintiff
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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

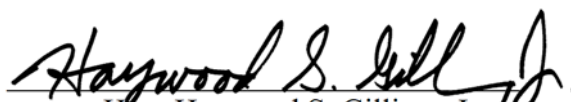
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ORDER

Presently before the Court is the parties' Second Stipulation [and Proposed Order] Regarding Extension of the Deadline for Submission of a Stipulated Judgment. The deadline is hereby extended until April 26, 2019.

IT IS SO ORDERED.

Date: April 15, 2019


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