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Attorneys for Defendant
Chipotle Mexican Grill, Inc.

15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
OAKLAND DIVISION

17 MARTIN SCHNEIDER, SARAH
DEIGERT, THERESA GAMAGE, and
18 NADIA PARIKKA, Individually and on
Behalf of All Others Similarly Situated,

19 Plaintiffs,

20 v.

21 CHIPOTLE MEXICAN GRILL, INC., a
22 Delaware Corporation,

23 Defendant.

Case No. 4:16-cv-02200-HSG (KAW)

**NOTICE OF SETTLEMENT AND JOINT
STIPULATION AND REQUEST TO
VACATE DATES AND ~~PROPOSED~~
ORDER SETTING DATE TO FILE
MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT**

Judge: Hon. Haywood S. Gilliam, Jr.
Ctm: 2, 4th Floor
Next Hearing: July 18, 2019
Time: 2:00 p.m.

1 Plaintiffs Martin Schneider, Sarah Deigert, Theresa Gamage, and Nadia Parikka
2 (“Plaintiffs”) and Defendant Chipotle Mexican Grill, Inc. (“Defendant,” and with Plaintiffs, the
3 “Parties”) hereby inform the Court that, after a second all-day mediation on July 2, 2019 with the
4 Hon. Jay C. Gandhi (Ret.) of JAMS, the Parties have reached and executed a settlement term
5 sheet as to the core terms of a class action settlement that will resolve all claims against
6 Defendant. After the Parties finalize the remaining details and terms, they will then execute a
7 formal, comprehensive class action settlement agreement.

8 Accordingly, the Parties, by and through their attorneys, hereby jointly stipulate and
9 request that the Court approve the following:

10 1. In light of the execution of the settlement term sheet by the Parties to settle this
11 action, all pending dates, including the hearing on Defendant’s Motion to Decertify the Classes,
12 currently scheduled for July 18, 2019, should be vacated.

13 2. Plaintiffs will submit their Motion for Preliminary Approval of the settlement
14 within 45 days of the Court’s approval of this Stipulation.

15 **IT IS SO STIPULATED.**

16
17
18 DATED: July 3, 2019

Respectfully submitted,

KAPLAN FOX & KILSHEIMER LLP

19 By: /s/ Laurence D. King
20 Laurence D. King

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DATED: July 3, 2019

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~~PROPOSED~~ ORDER

Good cause appearing, the foregoing Stipulation is approved and it is hereby ORDERED that:

1. All pending dates, including the hearing on Defendant’s Motion to Decertify the Classes, are VACATED.
2. Plaintiffs will file their motion for preliminary approval of the settlement no later than 45 days after entry of this Order.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 7/5/2019



HON. HAYWOOD S. GILLIAM, JR.
United States District Court Judge

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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Mario M. Choi, attest that concurrence in the filing of this document has been obtained from the other signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 3rd day of July, 2019, at San Francisco, California.

/s/ Mario M. Choi
Mario M. Choi