

1 Laurence D. King (SBN 206423)
 Matthew B. George (SBN 239322)
 2 Mario M. Choi (SBN 243409)
KAPLAN FOX & KILSHEIMER LLP
 3 350 Sansome Street, Suite 400
 San Francisco, CA 94104
 4 Telephone: 415-772-4700
 Facsimile: 415-772-4707
 5 *lking@kaplanfox.com*
mgeorge@kaplanfox.com
 6 *mchoi@kaplanfox.com*

Angela C. Agrusa (SBN 131337)
angela.agrusa@dlapiper.com
 Shannon E. Dudic (SBN 261135)
shannon.dudic@dlapiper.com
DLA PIPER LLP (US)
 2000 Avenue of the Stars, Suite 400
 North Tower
 Los Angeles, CA 90067
 Telephone: 310-500-3500
 Facsimile: 310-500-3300

7 Frederic S. Fox (*pro hac vice*)
 Donald R. Hall (*pro hac vice*)
 8 **KAPLAN FOX & KILSHEIMER LLP**
 850 Third Avenue, 14th Floor
 9 New York, NY 10022
 Telephone: 212-687-1980
 10 Facsimile: 212-687-7714
ffox@kaplanfox.com
 11 *dhall@kaplanfox.com*

Charles C. Cavanagh (SBN 198468)
ccavanagh@messner.com
MESSNER REEVES LLP
 1430 Wynkoop Street, Suite 300
 Denver, CO 80202
 Telephone: 303-623-1800
 Facsimile: 303-623-0552

*Attorneys for Defendant
 Chipotle Mexican Grill, Inc.*

12 [Additional Attorneys on Signature Page]

13 *Attorneys for Plaintiffs and the Classes*

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

**JOINT STIPULATION AND ORDER
 CONTINUING DEADLINE TO FILE
 MOTION FOR PRELIMINARY
 APPROVAL OF SETTLEMENT**

Judge: Hon. Haywood S. Gilliam, Jr.
 Ctrm: 2, 4th Floor

1 **WHEREAS**, on July 2, 2019, Plaintiffs Martin Schneider, Sarah Deigert, Theresa
2 Gamage, and Nadia Parikka (“Plaintiffs”) and Defendant Chipotle Mexican Grill, Inc.
3 (“Defendant,” and with Plaintiffs, the “Parties”) completed an in-person mediation with the Hon.
4 Jay C. Gandhi (Ret.) of JAMS and executed a Settlement Term Sheet to settle this Action;

5 **WHEREAS**, pursuant to the Notice of Settlement and Joint Stipulation and Request to
6 Vacate Dates and Order Setting Date to File Motion for Preliminary Approval of Settlement (the
7 “Stipulation”), Plaintiffs indicated that they intended to file their motion for preliminary approval
8 of the settlement within 45 days of the Court’s approval of the Stipulation, or August 19, 2019;

9 **WHEREAS**, Plaintiffs have received competitive bids from prospective settlement
10 administrators and, with Defendant, require additional time to review and select an appropriate
11 settlement administrator, as well as additional time to work with that administrator to ensure that
12 a proposed claims process will encourage maximum class member participation;

13 **WHEREAS**, the Parties have made substantial progress toward completing a Stipulation
14 of Settlement and related documents, but require additional time to complete those efforts;

15 **WHEREAS**, the Parties have conferred and agree that Plaintiffs’ deadline to file their
16 motion for preliminary approval of the settlement shall be continued to September 4, 2019;

17 **WHEREAS**, the Court’s next available hearing date is in January 2020 and, should the
18 Court hold a hearing, the extension sought here will not delay the Court’s consideration of the
19 motion in that time frame;

20 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED** between the
21 Parties, through their respective counsel, to the request for entry of an Order providing that
22 Plaintiffs’ deadline to file their motion for preliminary approval of the settlement shall be
23 September 4, 2019.

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1 **IT IS SO STIPULATED.**

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3 DATED: August 15, 2019

4 Respectfully submitted,

5 **DLA PIPER LLP (US)**

KAPLAN FOX & KILSHEIMER LLP

6 By: /s/ Angela C. Agrusa
 Angela C. Agrusa

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

7
8 Angela C. Agrusa (SBN 131337)
9 angela.agrusa@dlapiper.com
10 Shannon E. Dudic (SBN 261135)
11 shannon.dudic@dlapiper.com
12 2000 Avenue of the Stars, Suite 400 North
13 Tower
14 Los Angeles, CA 90067
15 Telephone: 310-500-3500
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 350 Sansome Street, Suite 400
 San Francisco, CA 94104
 Telephone: 415-772-4700
 Facsimile: 415-772-4707
 lking@kaplanfox.com
 mgeorge@kaplanfox.com
 mchoi@kaplanfox.com

13 Charles C. Cavanagh (SBN 198468)

14 ccavanagh@messner.com
15 **MESSNER REEVES LLP**
16 1430 Wynkoop Street, Suite 300
17 Denver, CO 80202
18 Telephone: 303-623-1800
19 Facsimile: 303-623-0552

KAPLAN FOX & KILSHEIMER LLP

 Frederic S. Fox (*pro hac vice*)
 Donald R. Hall (*pro hac vice*)
 850 Third Avenue, 14th Floor
 New York, NY 10022
 Telephone: 212-687-1980
 Facsimile: 212-687-7714
 ffox@kaplanfox.com
 dhall@kaplanfox.com

20 Attorneys for Defendant Chipotle Mexican
21 Grill, Inc.

KOBRE & KIM LLP

 Matthew I. Menchel (*pro hac vice*)
 201 South Biscayne Boulevard, Suite 1900
 Miami, FL 33131
 Telephone: 305-967-6108
 matthew.menchel@kobrekim.com

KOBRE & KIM LLP

 Hartley M. K. West (SBN 191609)
 150 California Street, 19th Floor
 San Francisco, CA 94111
 Telephone: 415-582-4781
 Facsimile: 415-582-4811
 hartley.west@kobrekim.com

 Attorneys for Plaintiffs and the Classes

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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 15th day of August, 2019, at San Francisco, California.

/s/ Mario M. Choi
Mario M. Choi

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ORDER

Good cause appearing, pursuant to the Stipulation, Plaintiffs' deadline to file their motion for preliminary approval of the settlement is extended to September 4, 2019.

IT IS SO ORDERED.

DATED: 8/16/2019



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