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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
 18 DEIGERT, THERESA GAMAGE, and
 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**, because the Parties needed additional time to complete negotiations, the
10 Court granted the Parties’ joint stipulation to continue Plaintiffs’ deadline to file their motion for
11 preliminary approval of the settlement to September 4, 2019 [Dkt. 198];

12 **WHEREAS**, Plaintiffs, in consultation with Defendant, recently selected an appropriate
13 settlement administrator, and Plaintiffs are working with that administrator to ensure that a
14 proposed claims process will encourage maximum class member participation and that other
15 issues concerning notice and settlement administration are appropriately resolved;

16 **WHEREAS**, the Parties’ review of the Stipulation of Settlement and related documents
17 was delayed because one of the principal attorneys for Plaintiffs’ Counsel was completing jury
18 service in the Alameda County Superior Court;

19 **WHEREAS**, the Parties have substantially completed the Stipulation of Settlement and
20 related documents, but require additional time to negotiate and resolve some remaining open
21 issues and to conclude those efforts;

22 **WHEREAS**, the Parties have conferred and agree that Plaintiffs’ deadline to file their
23 motion for preliminary approval of the settlement shall be continued to September 11, 2019;

24 **WHEREAS**, the Court’s hearing date on the Intervenor’s Motion to Intervene is
25 scheduled for January 16, 2020, which the Parties also intend to set as the date of Plaintiffs’
26 Motion for Preliminary Approval of Settlement, and, should the Court hold a hearing, the
27 extension sought here will not delay the Court’s consideration of the motion in that time frame;

28 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED** between the

1 Parties, through their respective counsel, to the request for entry of an Order providing that
2 Plaintiffs' deadline to file their motion for preliminary approval of the settlement shall be
3 September 11, 2019.

4 **IT IS SO STIPULATED.**

5 DATED: September 4, 2019

6 Respectfully submitted,

7 **DLA PIPER LLP (US)**

KAPLAN FOX & KILSHEIMER LLP

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

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

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

I, Laurence D. King, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 4th day of September, 2019, at San Francisco, California.

/s/ Laurence D. King
Laurence D. King

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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 11, 2019.

IT IS SO ORDERED.

DATED: 9/5/2019



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