

1 Laurence D. King (SBN 206423)
 Matthew B. George (SBN 239322)
 2 Mario M. Choi (SBN 243409)
KAPLAN FOX & KILSHEIMER LLP
 3 1999 Harrison Street, Suite 1560
 Oakland, CA 94612
 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 Hartley M. K. West (SBN 191609)
KOBRE & KIM LLP
 8 150 California Street, 19th Floor
 San Francisco, CA 94111
 9 Telephone: 415-582-4781
 Facsimile: 415-582-4811
 10 *hartley.west@kobrekim.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

11 [Additional Attorneys on Signature Page]
 12 *Attorneys for Plaintiffs and the Classes*

*Attorneys for Defendant
 Chipotle Mexican Grill, Inc.*

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

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

19 Plaintiffs,

20 v.

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

22 Defendant.

Case No. 4:16-cv-02200-HSG

**JOINT STIPULATION AND
 ORDER SETTING DATES**

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

1 Pursuant to the Court’s January 31, 2020 Order Granting Preliminary Approval of
2 Settlement [Dkt. 219], Plaintiffs Martin Schneider, Sarah Deigert, Theresa Gamage, and Nadia
3 Parikka (“Plaintiffs”) and Defendant Chipotle Mexican Grill, Inc. (“Defendant,” and with
4 Plaintiffs, the “Parties”), have met and conferred as to a schedule that would, among other things,
5 set a hearing date for Plaintiffs’ motion for final approval of the Settlement entered into by the
6 parties on or about September 11, 2019 [Dkt. 205-2].

7 The Parties, by and through their attorneys, hereby jointly stipulate and request that the
8 Court approve the following timeline of events:

Event	Date
Deadline for Settlement Administrator to Begin Notice Program	March 31, 2020
Filing Deadline for Attorneys’ Fees and Costs Motion	April 24, 2020
Filing Deadline for Incentive Payment Motion	April 24, 2020
Deadline for Class Members to Opt-Out or Object to Settlement and/or Application for Attorneys’ Fees and Costs and Incentive Payment	May 30, 2020
Filing Deadline for Final Approval Motion	June 1, 2020
Final Fairness Hearing and Hearing on Motions	July 30, 2020 at 2:00 p.m.

18 **IT IS SO STIPULATED.**

19 Respectfully submitted,

20 **KAPLAN FOX & KILSHEIMER LLP**

21 DATED: February 4, 2020

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

23 Laurence D. King (SBN 206423)
24 Matthew B. George (SBN 239322)
25 Mario M. Choi (SBN 243409)
26 1999 Harrison Street, Suite 1560
27 Oakland, CA 94612
28 Telephone: 415-772-4700
Facsimile: 415-772-4707
lking@kaplanfox.com
mgeorge@kaplanfox.com
mchoi@kaplanfox.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

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

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

Attorneys for Plaintiffs and the Classes

DLA PIPER LLP (US)

DATED: February 4, 2020

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

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

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.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

Good cause appearing, the foregoing JOINT STIPULATION AND [PROPOSED] ORDER SETTING DATES (“Stipulation”) is GRANTED and the following Schedule is ENTERED:

Event	Date
Deadline for Settlement Administrator to Begin Notice Program	March 31, 2020
Filing Deadline for Attorneys’ Fees and Costs Motion	April 24, 2020
Filing Deadline for Incentive Payment Motion	April 24, 2020
Deadline for Class Members to Opt-Out or Object to Settlement and/or Application for Attorneys’ Fees and Costs and Incentive Payment	May 30, 2020
Filing Deadline for Final Approval Motion	June 1, 2020
Final Fairness Hearing and Hearing on Motions	July 30, 2020 at 2:00 p.m.

IT IS SO ORDERED.

DATED: 2/4/2020


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