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16	Attorneys for Defendant INDEED, INC.		
17			
18	UNITED STATES DISTRICT COURT		
19	NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION		
20	ADAM ROSH, individually, on behalf of others similarly situated, and on behalf of the	Case No. 5:13-cv-03751-RMW	
21	general public,	STIPULATION AND [] ORDER TO ADJUST CASE	
22	Plaintiff,	MANAGEMENT SCHEDULE	
23	VS.	Case Management Conference	
24	INDEED, INC.,	Date: May 2, 2014	
25	Defendant.	Time: 10:30 a.m. Judge: Hon. Honorable Ronald M. Whyte	
26		Crtrm: 6	
27		Complaint filed: August 13, 2013	
28			
	C-13-03751 RMW	STIPULATION AND [] ORDER TO ADJUST CASE MANAGEMENT SCHEDULE	

1	Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, Local Rule 6-2, and Local		
2	Rule 7-12, Plaintiff Adam Rosh ("Rosh") and Defendant Indeed, Inc. ("Indeed") hereby stipulate		
3	and respectfully request that the Court vacate the case management conference in this matter. The		
4	parties have reached a settlement in principle, and anticipate filing a motion for settlement		
5	approval shortly with the Court.		
6	WHEREAS, Rosh filed a Class and Collective Action Complaint in this matter on August		
7	13, 2013 (Dkt. No. 1);		
8	WHEREAS, on September 17, 2013, the Court ordered that the parties submit a Joint		
9	Case Management Statement by December 6, 2013, and set a Case Management Conference for		
10	December 13, 2013 (Dkt. No. 15);		
11	WHEREAS, Indeed filed an Answer to the Class and Collective Action Complaint on		
12	October 4, 2013 (Dkt. No. 16);		
13	WHEREAS, the parties agreed in the Stipulation and Order entered by this Court on		
14	November 19, 2013, to submit this case to private mediation to be completed by March 31, 2014		
15	(Dkt. No. 19);		
16	WHEREAS, in the joint case management statement submitted on November 26, 2013,		
17	the parties agreed to postpone all discovery in this matter until after the conclusion of mediation;		
18	WHEREAS, this Court entered an order continuing the Case Management Conference		
19	until April 25, 2014 (Dkt. 22), and subsequently rescheduled the conference for May 2, 2014		
20	(Dkt. 31);		
21	WHEREAS, the parties engaged in private mediation on March 14, 2014 and reached an		
22	agreement in principle to settle this case; and		
23	WHEREAS, the parties are working on drafting the final settlement agreement, approval		
24	papers, and supporting documentation, and intend to file a joint motion for settlement approval in		
25	the near future;		
26	THEREFORE, Plaintiff Rosh and Defendant Indeed, through the undersigned counsel,		
27	hereby stipulate and request that the Court vacate the Case Management Conference in this matter		
28			
	C-13-03751 RMW - 1 - STIPULATION AND [] ORDER TO ADJUST CASE MANAGEMENT SCHEDULE		

1	in light of the parties' plan to submit a motion for settlement approval. The parties will seek a		
2	hearing with this Court to consider the parties' motion for settlement approval.		
3		The second s	
4	Respectfully submitted,		
5	nespectrung submitted,		
6		ADAM W. HANSEN	
7		NICHOLS KASTER LLP	
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9		By: /s/ Adam W. Hansen ADAM W. HANSEN	
10		Attorneys for Plaintiff ADAM ROSH	
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12			
13	Dated: April 25, 2014	Munger, Tolles & Olson LLP MALCOLM A. HEINICKE	
14		KATHERINE M. FORSTER JESLYN A. MILLER	
15			
16		By: <u>/s/ Katherine M. Forster</u>	
17		By: <u>/s/ Katherine M. Forster</u> KATHERINE M. FORSTER	
18		Attorneys for Defendant, NDEED, INC.	
19			
20			
21			
22	[] ORDER		
23	Pursuant to the stipulation of counsel, IT IS SO ORDERED.		
24	Dated:		
25	The Honorable Ronald M. Whyte District Judge		
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<mark>2</mark> 7			
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	C-13-03751 RMW -	2 - STIPULATION AND [] ORDER TO ADJUST CASE MANAGEMENT SCHEDULE	