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d/b/a International Marketplace
 18

19 **UNITED STATES DISTRICT COURT**
 20 **DISTRICT OF NEVADA**

21 CIRENA TORRES, on behalf of herself and
 22 all others similarly situated,
 23 **Plaintiffs,**
 24 vs.
 25 KWONG YET LUNG CO., INC.
 d/b/a International Marketplace, and DOES
 26 1 through 100, inclusive,
 27 **Defendants.**
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Case No. 2:14-cv-02223-MMD-PAL

**STIPULATION AND [PROPOSED]
 ORDER TO CONTINUE THE
 DEADLINE TO FILE MOTION FOR
 PRELIMINARY APPROVAL OF
 CLASS SETTLEMENT FOR 14 DAYS**

(SECOND REQUEST)

1 Pursuant to Local Rule 6-1, Plaintiff Cirena Torres and Defendant Kwong Yet Lung
2 Co., Inc. d/b/a International Marketplace (hereinafter “International Marketplace”), by and
3 through their respective undersigned counsel, submit this Stipulation and [Proposed] Order
4 To Continue The Deadline To File Motion For Preliminary Approval Of Class Settlement
5 For 14 Days, and Plaintiff and Defendant stipulate, agree, and hereby request as follows:

6 **STIPULATION**

7 1. The current deadline to file a motion for preliminary approval of class
8 settlement is today, October 1, 2015. This current deadline was set by the Court pursuant
9 to an earlier stipulation by the parties (Dkt. No. 16), which was approved by the Court
10 (Dkt. No. 17).

12 2. The parties have prepared and entered into a written and signed class-wide
13 settlement agreement (including proposed notices to the class, claim form, and proposed
14 order attached thereto) and a copy of that settlement agreement (including the attachments)
15 was filed with the Court earlier today (Dkt. No. 21).

17 3. Because the parties have entered into class-wide settlement (and have filed
18 their written and signed settlement agreement with the Court, Dkt. No. 21), the class-wide
19 settlement will require the Court's review and approval pursuant to Rule 23(e) of the
20 Federal Rules of Civil Procedure.

22 4. The parties agree they need a short extension in order to prepare the motion
23 for preliminary approval. Accordingly, the parties respectfully request and stipulate that
24 the Court extend the current October 1, 2015 deadline to file a motion for preliminary
25 approval of class settlement for 14 days, until and including October 15, 2015.

1 Dated: October 1, 2015

Respectfully submitted,

2 By: /s/ Chant Yedalian, Esq
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24 *Attorneys for Kwong Yet Lung Co., Inc.*
25 *d/b/a International Marketplace*

26 **ORDER**

27 Having considered the foregoing Stipulation and finding good cause appearing,
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IT IS HEREBY, ORDERED, ADJUDGED, AND DECREED that the foregoing Stipulation is GRANTED and the deadline to file a motion for preliminary approval of class settlement is extended and continued for a period of 14 days, until and including October 15, 2015.

IT IS SO ORDERED.

Dated: October 1, 2015



HON. MIRANDA M. DU
United States District Judge

CERTIFICATE OF SERVICE

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I hereby certify that I electronically filed the foregoing with the Court using the CM/ECF system which will send notification of such filing to the electronic service list for this case.

Dated: October 1, 2015

CHANT & COMPANY
A Professional Law Corporation

By: /S/ Chant Yedalian
Chant Yedalian