

The Honorable Robert S. Lasnik

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TORREY GRAGG, on his own behalf and on
behalf of similarly situated persons,

Plaintiff,

v.

ORANGE CAB COMPANY, INC., a
Washington corporation; and RIDECHARGE,
INC., a Delaware corporation d/b/a TAXI
MAGIC,

Defendants.

No. C12-0576RSL

STIPULATION AND
~~PROPOSED~~ ORDER
CLARIFYING CLAIM FORM
DEADLINE

I. STIPULATION

The parties, by and through their attorneys of record, respectfully request that the Court clarify that the deadline for Settlement Class Members to submit Claim Forms shall be May 30, 2017—60 days after Class Notice is sent. In support of this request, the parties stipulate and agree as follows:

1. The Settlement Agreement provides that Settlement Class Members shall submit Claim Forms “no later than the date specific in the Class Notice, which date shall be sixty (60) calendar days after the deadline for the Settlement Administrator to send Class Notice” Settlement Agreement ¶ 4.03(b) [Dkt. 199 at 17 of 66].

2. Consistent with the 60-day post-notice deadline for Claim Forms in the Settlement Agreement, the ~~Proposed~~ Order Granting Preliminary Approval of Class Action

1 Settlement provides “a valid Claim Form, as defined in Paragraph 4.03 of the Agreement, must
2 be submitted as required in the Class Notice over the Internet or postmarked no later than sixty
3 (60) days after Class Notice is sent.” [Dkt. 198-1 at 5, ¶ 12.]

4 3. Unfortunately, the [Proposed] Order later provided in the dates of performance
5 summary that “Settlement Class Members who desire to submit Claim Forms shall do so by
6 [insert date], i.e., at least one hundred twenty-five (125) days after commencement of Class
7 Notice.” *Id.* at 8, ¶ 15(g). The 125 day guidance was intended to be added to the prior paragraph
8 regarding the Settlement Hearing date, but was mistakenly added to the Claim Form deadline
9 summary.

10 4. Thus, in the signed Order Granting Preliminary Approval of Class Action
11 Settlement [Dkt. 202] the Court understandably followed the parties’ suggestion that it set a
12 Claim Form deadline at least 125 days after Class Notice and entered a deadline of August 4,
13 2017, in paragraph 15(g) of the Order while maintaining at paragraph 12 the deadline 60 days
14 after Class Notice.

15 5. The parties apologize for the confusion, stipulate, and respectfully request that the
16 Court enter an Order clarifying that the deadline to submit Claim Forms is May 30, 2017—60
17 days after Class Notice. As the Class Notice deadline is March 31, 2017, and Class Notice will
18 need to recite the Claim Form deadline, the parties respectfully request the Court’s guidance at
19 its earliest convenience.

20 Respectfully submitted this 21st day of March, 2017, by:

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II. ORDER

Having considered the foregoing Stipulation and for good cause shown, it is hereby
ORDERED that Settlement Class Members who desire to submit Claim Forms shall do so by
May 30, 2017.

DATED: March 23, 2017. MTS Lasnik
Honorable Robert S. Lasnik
United States District Judge