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17 **UNITED STATES DISTRICT COURT**
18 **EASTERN DISTRICT OF CALIFORNIA**

19
20 MARISOL GOMEZ and IGNACIO OSORIO,
on behalf of themselves and others similarly
21 situated,

22 Plaintiffs,

23 vs.

24 J. JACOBO FARM LABOR CONTRACTOR,
INC., and Does 1 through 20, inclusive,

25 Defendants.
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Case No. 1:15-cv-01489-AWI-BAM

**STIPULATION AND ~~PROPOSED~~ ORDER
RE: CLASS NOTICE AND DISTRIBUTION
PLAN**

Complaint Filed: September 30, 2015

1 Plaintiffs MARISOL GOMEZ and IGNACIO OSORIO (“Plaintiffs”), by and through his
2 counsel of record, Mallison & Martinez and Martinez, Aguilascho & Lynch, and Defendant J.
3 JACOBO FARM LABOR CONTRACTOR (“J. Jacobo” or “Defendant”), by and through their
4 counsel of record, Michael J. F. Smith, A Professional Corporation, hereby stipulate to the
5 following, and request that the Court adopt as an order:

6 WHEREAS, the Honorable Anthony W. Ishii issued an Order (Doc. 149) on February 8,
7 2021, requiring that the parties amend the class notice in a manner consistent with the order.

8 WHEREAS, the Parties have met and conferred and agreed upon a proposed Class Notice
9 and have agreed on a Spanish translation. A true and correct copy of the jointly proposed English
10 Class Notice is attached to this stipulation as Exhibit A. A true and correct copy of the jointly
11 proposed Spanish Class Notice is attached to this stipulation as Exhibit B.

12 NOW THEREFORE, the Parties STIPULATE as follows and respectfully request the Court
13 adopt as an order:

- 14 1. The Court finds that the revised Class Notice attached as Exhibits A and B provides
15 appropriate notice of the certified class claims in this matter.
- 16 2. The Court orders the Defendant to provide the Class List within 10 days of this Order.
- 17 3. Once the Class List is obtained, the Class Action Administrator can distribute the
18 Class Notice within 20 days of the receipt of the Class List and finalized notice
19 documents.
- 20 4. Each class member shall have 45 days to exclude himself or herself from the class
21 action.
- 22

23 Respectfully submitted,

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1 Dated: April 7, 2021

MALLISON & MARTINEZ

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3 By: /s/ Natalia Ramirez Lee
Natalia Ramirez Lee

4
5 Dated: April 7, 2021

MICHAEL J.F. SMITH, A PROFESSIONAL CORP.

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7 By: /s/ John L. Migliazzo
John L. Migliazzo

~~PROPOSED~~ ORDER

IT IS HEREBY ORDERED that the parties' stipulation (Doc. No. 154) is approved as follows:

1. The amended class notice (Doc. Nos. 154-1, 154-2) complies with the Court's previous order directing amendment of the class notice (Doc. No. 151) and the requirements of Federal Rule of Civil Procedure 23(c)(2)(B), and is APPROVED.
2. Defendant shall provide the class list to the class action administrator within ten (10) days of service of this order.
3. The class action administrator shall distribute the amended class notice within twenty (20) days of its receipt of the class list and finalized class notice documents.
4. Each class member shall have forty-five (45) days to exclude himself or herself from the class action.

IT IS SO ORDERED.

Dated: April 7, 2021



SENIOR DISTRICT JUDGE