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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

MARK ANDERSON, Plaintiff, vs. SAFE STREETS USA LLC., and Does 1 through 50, inclusive, Defendant.	No. 2-18-CV-00323-KJM-JDP **JOINT STIPULATION RE REVISIONS TO CLASS NOTICE AND RESCHEDULING OF MOTION DEADLINES AND FINAL APPROVAL HEARING DATE; [PROPOSED] AMENDED PRELIMINARY APPROVAL ORDER** Judge: Hon. Kimberly J. Mueller Ctrm: 03, 15th Floor

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

Plaintiff Mark Anderson ("Plaintiff") and Defendant Safe Streets USA LLC ("Defendant") (collectively, the "Parties"), by and through their respective counsel of record, hereby stipulate and agree that (1) the Notice of Class Action Settlement previously approved by the Court be revised to provide class members a projection of their individual settlement payments, (2) the filing deadline for Plaintiff's final approval and attorneys' fees motions, and the date of the Final Approval Hearing, be continued from the dates previously set by the Court, and (3) the Court issue an Amended Preliminary Approval Order incorporating these agreements, for the following reasons:

WHEREAS, on January 4, 2022, the Court issued an Order (Dkt. No. 45, hereinafter "Preliminary Approval Order") preliminarily approving the Parties' class action settlement, including the approval of the Parties' proposed Notice of Class Action Settlement (Dkt. No. 43-2, Exh. A, hereinafter "Class Notice");

WHEREAS, the Class Notice does not provide a projection of the individual settlement payments to be made to class members who choose to participate in the settlement;

WHEREAS, the Parties believe that providing class members a projection of their individual settlement payments is appropriate and will better inform their decisions regarding whether to participate in the settlement, as well as facilitate the administration of the settlement;

WHEREAS, the Preliminary Approval Order sets a deadline of February 10, 2022, for the filing of Plaintiff's Motions for Final Approval and Attorneys' Fees, and a hearing date of March 25, 2022, for the Final Approval Hearing (Dkt. No. 45, ECF p. 21);

WHEREAS, the Preliminary Approval Order required Defendant to provide the Settlement Administrator with class contact information and other data by January 24, 2022, and requires the Settlement Administrator to mail class notice packets to class members by February 13, 2022 (*Id.*, ECF p. 20);

WHEREAS, the Preliminary Approval Order provides that class members shall have 60 days, or until April 14, 2022, to object or opt-out of the settlement (*Id.*, ECF p. 21);

WHEREAS, the current motions filing deadline (Feb. 10) and Final Approval Hearing Date (Mar. 25) pre-date the deadline (Apr. 14) for class members to object or opt-out of the settlement;

NOW, THEREFORE, the Parties stipulate and agree as follows:

(1) That section B.2. of the previously-approved Class Notice (Dkt. 43-2, ECF p. 74) be revised so as to add the following sentence at the end of that section - "Your projected gross settlement payment is set forth in an attachment to this notice.";

(2) That an attachment be appended to each Class Notice that reads as follows -

"GROSS SETTLEMENT PAYMENT PROJECTION FOR
(Name of Class Member)
Gross Settlement Payment Projection: _____"

(3) That the filing deadline for Plaintiff's motions for final approval and for attorneys' fees be continued from February 10 to no earlier than April 18, 2022; and

(4) That the Final Approval Hearing be continued from March 25 to no earlier than May 27, 2022.

IT IS SO STIPULATED, THROUGH THE PARTIES' COUNSEL OF RECORD.

Date: February 2, 2022

WORKMAN LAW FIRM, PC
By: /s/Robin G. Workman
Robin G. Workman
Attorneys for Mark Anderson, and aggrieved employees

Date: February 2, 2022

HOLLAND & KNIGHT LLP
By: /s/Thomas Hill
Thomas E. Hill
Attorneys for Defendant Safe Streets USA LLC.

ORDER

Pursuant to the stipulation of the parties, the court finds as follows:

IT IS ORDERED that the court's Preliminary Approval Order, ECF No. 45, is hereby amended to incorporate the parties' stipulations as set forth herein, and that the filing deadline for plaintiff's final approval and attorneys' fees motions and the hearing date for the Final Approval Hearing are hereby continued as follows:

1. The filing deadline for plaintiff's motions for final approval and attorneys' fees is rescheduled from February 10, 2022, to April 18, 2022.

2. The Final Approval Hearing is rescheduled from March 25, 2022, to June 17, 2022, at 10:00 a.m. in Courtroom No. 03, 15th Floor, of the Robert T. Matsui Federal Courthouse, 501 "I" Street, Sacramento, California 95814.

IT IS SO ORDERED.

DATED: February 2, 2022.

CHIEF UNITED STATES DISTRICT JUDGE