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14 KEURIG GREEN MOUNTAIN, INC.

15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN JOSE DIVISION**

18 ALVARO SANCHEZ on behalf of himself
and all other similarly situated employees,
19
20 Plaintiff,

21 v.

22 KEURIG GREEN MOUNTAIN, INC.; and
DOES 1 through 100, inclusive,
23
24 Defendants.

Case No. 15-cv-04657-EJD

[Monterey County Superior Court
Case No. M132626]

**STIPULATION AND ~~PROPOSED~~ ORDER
CONTINUING THE HEARING ON PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF THE
CLASS ACTION SETTLEMENT**

Complaint Filed: 07/14/15
Notice of Removal Filed: 10/07/15
Trial Date: TBA

Judge: Honorable Edward J. Davila

1 Subject to approval by the Court, Plaintiff Alvaro Sanchez and Defendant Keurig Green
2 Mountain, Inc., (collectively referred to as the “Parties”), by and through their counsel of record
3 herein, pursuant to Local Rules, Rule 7-12, stipulate and agree as follows:

4 WHEREAS, on March 23, 2018, this Court granted preliminary approval of the class
5 action settlement agreement and set the final approval hearing on Plaintiff’s Motion for Final
6 Approval of the Class Action Settlement for July 12, 2018. [ECF No. 41]

7 WHEREAS, on April 6, 2018, this Court executed the Amended Order Preliminarily
8 Approving the Class Action Settlement. [ECF No. 44]

9 WHEREAS, Defendant has until April 20, 2018 to provide the Settlement Administrator
10 with the Class Members’ information for the dissemination of the Class Notice Packet.

11 WHEREAS, the Settlement Administrator has calculated that the soonest the Class
12 Notice Packet can be mailed to each Class Member is on May 11, 2018.

13 WHEREAS, the Class Members’ deadline to opt-out or object to the class action
14 settlement is July 10, 2018 (60 days from May 11, 2018) or two days before the Final Approval
15 hearing date.

16 WHEREAS, Plaintiff’s deadline to file his motion for final approval of the class action
17 settlement is June 27, 2018, nine court days before the Class Members’ opt-out/objection
18 deadline.

19 IT IS HEREBY STIPULATED AND AGREED by the Parties that in order to (1) provide
20 the Settlement Administrator with sufficient time to provide counsel with a declaration regarding
21 the administration of the class action settlement; and (2) extend Plaintiff’s deadline to file his
22 motion for final approval of the class action settlement after the Class Members’ deadline to opt-
23 out or object to the class action settlement has lapsed, the parties respectfully request that the
24 Court continue the hearing on Plaintiff’s Motion for Final Approval of the Class Action
25 Settlement set for July 12, 2018, to August 2, 2018, or soon thereafter as the matter may be
26 heard.

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IT IS SO STIPULATED.

DATED: April 17, 2018

FITZPATRICK, SPINI & SWANSTON

By: /s/ B. James Fitzpatrick
B. James Fitzpatrick, Esq.
Attorneys for Plaintiff,
Alvaro Sanchez

DATED: April 17, 2018

DYKEMA GOSSETT, LLP


By: /s/ Jon D. Cantor
Jon D. Cantor, Esq.
Attorneys for Defendant,
Keurig Green Mountain, Inc.

~~PROPOSED~~ ORDER

Based on the stipulation, and good cause appearing therefore, **IT IS HEREBY ORDERED** that the hearing on Plaintiff’s Motion for Final Approval of the Class Action Settlement set for July 12, 2018, is hereby continued to August 2, 2018.

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

DATED: April 17, 2018



Honorable Judge Edward J. Davila
United States Judge