

1 Ben F. Pierce Gore (SBN 128515)
PRATT & ASSOCIATES
2 634 North Santa Cruz Avenue
Suite 204
3 Los Gatos, CA 95030
Telephone: (408) 806-4600
4 pgore@prattattorneys.com

5 Keith M. Fleischman (admitted *pro hac vice*)
Joshua D. Glatter (admitted *pro hac vice*)
6 FLEISCHMAN BONNER & ROCCO, LLP
81 Main Street, Suite 515
7 White Plains, New York 10601
Telephone: (914) 278-5100
8 Fax: (917) 591-5245
kfleischman@fbrllp.com
9 jglatter@fbrllp.com

10 *Attorneys for Plaintiffs*

11 Mark C. Goodman (SBN 154692)
mark.goodman@bakermckenzie.com
12 Anne Kelts Assayag (SBN 298710)
anne.assayag@bakermckenzie.com
13 BAKER & McKENZIE LLP
Two Embarcadero Center, 11th Floor
14 San Francisco, CA 94111
Telephone: (415) 576-3000
15 Facsimile: (415) 576-3099

16 *Attorneys for Defendant*

17 IN THE UNITED STATES DISTRICT COURT
18 FOR THE NORTHERN DISTRICT OF CALIFORNIA
19 OAKLAND DIVISION

20 ALEX ANG and LYNNE STREIT,
21 individually and on behalf of all others
22 similarly situated,

23 Plaintiffs,

24 v.

25 BIMBO BAKERIES USA, INC.,

26 Defendant.

Case No. 4:13-CV-1196-HSG

SCHEDULING STIPULATION;
~~PROPOSED~~ ORDER

Judge: Hon. Haywood S. Gilliam, Jr.
Action Filed: March 18, 2013

1 Pursuant to Northern District Rule 6-1(b), and subject to the Court’s approval, Plaintiffs
2 Alex Ang and Lynne Streit (collectively, “Plaintiffs”) and defendant Bimbo Bakeries U.S.A., Inc.
3 (“BBUSA”) (collectively “the Parties”) respectfully submit the following Scheduling Stipulation
4 and proposed Order.

5 WHEREAS, on April 28, 2020, the Court granted preliminary approval of settlement in
6 the above-captioned action (“Preliminary Approval Order,” ECF No. 236);

7 WHEREAS, counsel for the Plaintiffs are presently preparing a joint motion for final
8 approval of settlement agreement and attorneys’ fees (“Final Approval Motion”) for review and
9 comment by BBUSA’s counsel;

10 WHEREAS, Plaintiffs’ counsel’s preparation of the Final Approval Motion has taken
11 slightly longer than originally anticipated;

12 WHEREAS, pursuant to the Preliminary Approval Order, the Parties are presently
13 scheduled to submit the Final Approval Motion on June 10, 2020, with objections due on July 24,
14 2020, and a final hearing to consider the Final Approval Motion scheduled for August 27, 2020;

15 WHEREAS, BBUSA’s counsel does not object to Plaintiffs’ counsel requesting that,
16 subject to the Court’s approval, the Final Approval Motion submission date be extended to June
17 17, 2020;

18 WHEREAS, the Parties have further agreed that, subject to the Court’s approval, the date
19 to submit objections to the Final Approval Motion be extended to July 31, 2020 in light of the
20 preceding requested extension;

21 WHEREAS, the Parties have further agreed that, subject to the Court’s approval, they shall
22 either: (1) issue updated announcements on Plaintiffs’ counsel’s and BBUSA’s websites advising
23 that the time to submit objections has been extended to July 31, 2020 (which Plaintiff shall draft
24 and submit to BBUSA’s counsel for its approval); or (2) revise the existing notice language on
25 their websites to reflect the updated dates;

26 WHEREAS, if the Court so directs, the Parties have further agreed that Plaintiffs’ counsel
27 shall also issue a press release advising of the scheduling change;

1 WHEREAS, counsel for the Parties reasonably anticipate these modest scheduling
2 adjustments will not require adjourning the currently-scheduled August 27, 2020 hearing for the
3 Final Approval Motion, subject to the Court's preferences; and

4 WHEREAS, this is the first request for an adjustment of the final approval schedule set
5 forth in the Preliminary Approval Order.

6 Subject to the Court's approval, the Parties stipulate and respectfully request that the Court:
7 (1) grant Plaintiffs' request to extend the time to submit the Final Approval Motion from June 10,
8 2020 to June 17, 2020; and (2) extend the time to file any objections to the Final Approval Motion
9 from July 24, 2020 to July 31, 2020.

10 Dated: June 4, 2020

11 /s/ Pierce Gore

12 Ben F. Pierce Gore (SBN 128515)
13 PRATT & ASSOCIATES
14 634 North Santa Cruz Avenue, Suite 204
15 Los Gatos, CA 95030
16 Telephone: (408) 806-4600
17 Fax: (408) 369-0752
18 pgore@prattattorneys.com

19 *Attorneys for Plaintiffs*

20 /s/ Mark C. Goodman

21 Mark C. Goodman (Bar No. 154692)
22 BAKER & MCKENZIE LLP
23 Two Embarcadero Center, Suite 1100
24 San Francisco, California 94111
25 Telephone: (415) 576-3000
26 Facsimile: (415) 576-3099
27 mark.goodman@bakermckenzie.com


28 *Attorneys for Defendant BBUSA*

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~~PROPOSED~~ ORDER

Pursuant to the accompanying Scheduling Stipulation; [Proposed] Order, and good cause appearing therefor, the Court hereby: (1) extends the parties' time to submit the Final Approval Motion from June 10, 2020 until June 17, 2020; and (2) extends the time to file any objections to the Final Approval Motion from July 24, 2020 to July 31, 2020.

Dated: 6/5/2020


Hon. Haywood S. Gilliam, Jr.
United States District Judge