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10 Attorneys for Plaintiffs and the Putative Classes
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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 HAROLD JONES, et al.,

14 Plaintiffs,

15 vs.

16 CERTIFIEDSAFETY, INC.

17 Defendants.

Lead Case No. 3:17-cv-02229-EMC
Consolidated with 3:17-cv-03892-EMC (*Crummie*)
Related to: 3:18-cv-04379-EMC (*Ross*)
3:19-cv-01338-EMC (*Jones II*)
3:19-cv-01380-EMC (*Jones III*)
3:19-cv-01381-EMC (*Jones IV*)
3:19-cv-01427-EMC (*East*)
3:19-cv-01428-EMC (*Jones V*)

18 **STIPULATION AND ~~PROPOSED~~ ORDER**
19 **EXTENDING PAGE LIMIT FOR PLAINTIFFS'**
20 **MOTION FOR PRELIMINARY APPROVAL**
21 **OF CLASS AND COLLECTIVE ACTION**
22 **SETTLEMENT**

23 Date: January 2, 2020
Time: 1:30 p.m.
Courtroom: 5 (17th Floor)
Judge: Honorable Edward M. Chen

24 *Jones* Complaint filed: April 21, 2017

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1 Plaintiffs in these consolidated and related actions, Harold Jones, Terre Crummie, Genea
2 Knight, Marcellous Ross, and Michael East (“Plaintiffs”), and Defendant CertifiedSafety, Inc.
3 (“Defendant”), through their respective counsel of record, hereby stipulate and agree as follows:

4 WHEREAS, Plaintiffs filed this putative Class and Collective action on April 21, 2017, and
5 have filed a series of consolidated and related actions;

6 WHEREAS, Plaintiffs and Defendant have reached a proposed Stipulation of Class,
7 Collective, and Representative Action Settlement (“Settlement”), following a mediation session
8 with mediator Paul Grossman, that globally resolves the claims in all of the actions;

9 WHEREAS, the deadline for Plaintiffs to file their Motion for Preliminary Approval of the
10 proposed Settlement is November 22, 2019;

11 WHEREAS, pursuant to Local Rule 7-2(b), a motion and accompanying memorandum of
12 points and authorities may not exceed 25 pages without leave of Court;

13 WHEREAS, Plaintiffs require more than 25 pages, and up to 40 pages, for their Motion for
14 Preliminary Approval due to the complex nature of the Settlement, which involves hybrid Rule 23
15 and FLSA claims, numerous Defendants, and the resolution of eight separate actions, and due to the
16 extensive amount of factual description, procedural history, and legal analysis that must be
17 presented;

18 WHEREAS, Plaintiffs and Defendant submit that there is good cause to extend the page
19 limit for Plaintiffs’ Motion for Preliminary Approval to provide the Court with a comprehensive
20 analysis of this complex Settlement;

21 NOW THEREFORE, IT IS HEREBY AGREED that the page limit for Plaintiffs’ Motion
22 for Preliminary Approval and accompanying memorandum be extended to 40 pages.

23 **IT IS SO STIPULATED.**

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26 Date: November 22, 2019

Respectfully submitted,

/s/ Carolyn Hunt Cottrell

Carolyn Hunt Cottrell

David C. Leimbach

Michelle S. Lim

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Date: November 22, 2019

/s/ Tristan R. Kirk
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Attorneys for Defendant

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~~PROPOSED~~ ORDER

Upon review of the parties' Stipulation and [Proposed] Order Extending Page Limit for Plaintiffs' Motion for Preliminary Approval of Class and Collective Action Settlement, and good cause appearing therefor, the Court hereby grants the Parties' request and extends the page limit for Plaintiffs' Motion for Preliminary Approval to 40 pages.

IT IS SO ORDERED.

Dated: November 25, 2019



HON. EDWARD M. CHEN
United States District Judge,
Northern District of California