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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

1 Edwin Aiwazian (SBN 232943)  
Arby Aiwazian (SBN 269827)  
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6 Attorneys for Plaintiffs and the Putative Classes and Collective  
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1 Plaintiffs in these consolidated and related actions, Harold Jones, Tierre 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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Scott L. Gordon  
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COTTRELL KONECKY  
WOTKYNS LLP

Attorneys for Plaintiffs and the Putative Classes and  
Collective

Date: November 22, 2019

/s/ Tristan R. Kirk  
Laura R. Petroff  
Emilie C. Woodhead  
Jason S. Campbell  
Tristan R. Kirk  
WINSTON & STRAWN LLP

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: \_\_\_\_\_

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

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**SIGNATURE ATTESTATION**

I hereby attest that all signatories listed above, on whose behalf this joint motion is submitted, concur in the filing's content and have authorized the filing.

Dated: November 22, 2019

/s/ Carolyn Hunt Cottrell  
Carolyn Hunt Cottrell

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court for the United States District Court, Northern District of California, by using the Court's CM/ECF system on November 22, 2019.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the Court's CM/ECF system.

Dated: November 22, 2019

/s/ Carolyn Hunt Cottrell  
Carolyn Hunt Cottrell