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16 *Interim Co-Lead Class Counsel*

17
18 **UNITED STATES DISTRICT COURT**
19 **CENTRAL DISTRICT OF CALIFORNIA**

19 MICHAEL CORONA, CHRISTINA
20 MATHIS, et al., individually and on behalf
21 of others similarly situated,

22 Plaintiffs,

23 vs.

24 SONY PICTURES ENTERTAINMENT,
25 INC.,

26 Defendant.

CASE NO. 2:14-CV-09600-RGK-E

27 **STIPULATION FOR ORDER**
28 **CONTINUING DEADLINES IN**
LIGHT OF PROPOSED
SETTLEMENT

Judge: Hon. R. Gary Klausner
Courtroom: 850

1 Plaintiffs and Defendant Sony Pictures Entertainment Inc. (“SPE”), by and through
2 their respective counsel, hereby stipulate and agree, and further request that the Court
3 enter an Order continuing all deadlines in this matter pending settlement, as follows:

4 WHEREAS, the Court appointed Girard Gibbs LLP, Lieff Cabraser Heimann &
5 Bernstein, LLP, and Keller Rohrback L.L.P. as Interim Co-Lead Class Counsel and
6 Keller Rohrback as liaison counsel (ECF No. 45);

7 WHEREAS, on May 5, 2015, the Court scheduled a jury trial for this matter for
8 February 9, 2016, and a discovery cut-off date of November 11, 2015 (ECF No. 71);

9 WHEREAS, on May 13, 2015, the Court entered an order setting a schedule for
10 briefing on Plaintiffs’ motion for class certification (ECF No. 79);

11 WHEREAS, the parties have been actively preparing this matter for trial, including
12 exchanges of written discovery requests and responses, production of documents, service
13 of expert witness reports, and depositions of party and expert witnesses;

14 WHEREAS, Plaintiffs filed a motion for class certification on June 30, 2015, SPE
15 opposed class certification on August 11, 2015, and Plaintiffs will timely reply on
16 September 2, 2015 unless otherwise ordered by the Court;

17 WHEREAS, pursuant to Civil Local Rule 16-15 and the Court’s Order for Jury
18 Trial, the parties participated in a mediation session on June 11, 2015;

19 WHEREAS, with the continuing assistance of the mediator, the parties continued
20 to discuss settlement and exchange settlement proposals;

21 WHEREAS, on September 1, 2015, Plaintiffs and SPE reached an agreement in
22 principle to settle all of the claims of the putative class against SPE, subject to final
23 documentation, which will be submitted for the Court’s approval in accordance with Fed.
24 R. Civ. Pro. 23(e);

25 WHEREAS, on September 1, 2015, pursuant to Civil Local Rule 16-15.7, counsel
26 for Plaintiffs and SPE reported the settlement to the Court’s deputy clerk;

1 WHEREAS, pursuant to Civil Local Rule 16-15.7, Interim Co-Lead Class Counsel
2 and counsel for SPE will prepare formal documentation of the settlement, including a
3 motion for preliminary approval of the settlement, for submission to the Court;

4 WHEREAS, to allow the parties sufficient time to complete settlement
5 documentation and present the settlement to this Court for preliminary approval, the
6 parties respectfully request the Court continue for 45 days all deadlines set forth in the
7 operative Order for Jury Trial (ECF No. 71);

8 WHEREAS, there have been no prior extensions requested in this matter, with the
9 exception of: (a) a request to continue the hearing on SPE’s motion to dismiss, which the
10 Court denied; and (b) a request to extend the date for Plaintiffs to file their motion for
11 class certification, which the Court granted in part.

12 **NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND**
13 **REQUEST THAT THE COURT ORDER THAT:**

14 1. All pending deadlines set forth in the operative Order for Jury Trial (ECF
15 No. 71) and in the Court’s May 13, 2015 Order (ECF No. 79) are continued for a period
16 of 45 days, pending submission to the Court of formal documentation of the settlement
17 and a motion for preliminary approval of the settlement; and

18 2. Plaintiffs’ motion for preliminary approval of the proposed settlement shall
19 be filed no later than October 19, 2015.

20
21
22 Dated: September 2, 2015

Respectfully submitted,

GIRARD GIBBS LLP

/s/ Daniel C. Girard

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Additional Plaintiffs' Counsel

Dated: September 2, 2015

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5 *Pursuant to Local Rule 5-4.3.4(a)(2)(i), this signatory attests that the other signatories
6 listed, on whose behalf the filing is submitted, concur in this filing's content and have
7 authorized this filing.
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CERTIFICATE OF SERVICE

I, Daniel C. Girard, hereby certify that on September 2, 2015, I caused the foregoing document to be filed electronically with the United States District Court for the Central District of California's through the Court's mandated ECF service. Counsel of record are required by the Court to be registered e-filers, and as such are automatically e-served with a copy of the document upon confirmation of e-filing.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 2nd day of September 2015 at San Francisco, California.

/s/ Daniel C. Girard