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

18
19 FLOR BARRAZA and NIKOLE HENSON,
20 individuals, on behalf of themselves and others
similarly situated,

21 **Plaintiffs,**

22 **v.**

23 CRICKET WIRELESS, LLC and LEAP
24 WIRELESS INTERNATIONAL, INC.,

25 **Defendants.**

Case No. 3:15-cv-02471-WHA

**JOINT STIPULATION REGARDING
SETTLEMENT**

Honorable William H. Alsup

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1 WHEREAS the parties hereby notify the Court pursuant to the Court's Standing Order for
2 Trial and Final Pretrial Conference in Civil Jury Cases ¶ 37 that they have reached a confidential
3 settlement regarding the last remaining issue in the case, the amount of attorneys' fees to be paid
4 to Plaintiffs' counsel;

5 WHEREAS, the parties believe and stipulate that there is no longer a need for the parties
6 to mediate the issue of attorneys' fees given the parties' agreement as to the amount of attorneys'
7 fees to be paid to Plaintiffs' counsel;

8 WHEREAS, the parties have engaged in confidential settlement discussions, have
9 swapped written versions of the settlement agreements, and are negotiating settlement provisions
10 which efforts likely would be frustrated if the parties are required to file the Rule 68 offer and
11 acceptance; and

12 WHEREAS, the parties anticipate memorializing their settlement in a written agreement
13 and filing a stipulation and request for dismissal by no later than December 23, 2015.

14 The parties hereby request that the Court modify its order dated December 17, 2015 (Dkt.
15 103) so that the parties be permitted to file a stipulation of dismissal of the action with prejudice
16 by no later than December 23, 2015 .

17
18 Dated: December 18, 2015

LAW OFFICES OF KEITH A. ROBINSON

19
20 By: /s/Keith A. Robinson
21 Keith A. Robinson

22 **Attorneys for Plaintiffs**
23 **FLOR BARRAZA and NIKOLE HENSON**

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Dated: December 18, 2015

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9 Dated: December 18, 2015

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14 Dated: December 18, 2015

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1 Dated: December 18, 2015

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Catherine C. Hwang

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9 **WIRELESS INTERNATIONAL, INC.**

10 Dated: December 18, 2015

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Raymond P. Bolanos

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17 **WIRELESS INTERNATIONAL, INC.**

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ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I, Chelsea Norell, hereby attest that I have obtained concurrence in the filing of this document, *Joint Stipulation Regarding Settlement*, from the other signatories to this document.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this eighteenth day of December, 2015 in Los Angeles, California.

/s/Chelsea Norell

Chelsea Norell

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

FLOR BARRAZA and NIKOLE HENSON,
individuals, on behalf of themselves and others
similarly situated,

Plaintiffs,

v.

CRICKET WIRELESS, LLC and LEAP
WIRELESS INTERNATIONAL, INC.,

Defendants.

Case No. 3:15-cv-02471-WHA

**[PROPOSED] ORDER GRANTING
JOINT STIPULATION REGARDING
SETTLEMENT**

Honorable William H. Alsup

Pursuant to the parties' Joint Stipulation dated December 18, 2015, and for good cause shown, IT IS HEREBY ORDERED that Court's order of December 17, 2015 (Dkt. 103) is vacated, and the parties request to instead file a request for dismissal of the action with prejudice by no later than December 23, 2015 is granted.

IT IS SO ORDERED.

Dated: _____, 2015

HON. WILLIAM ALSUP
UNITED STATES DISTRICT JUDGE