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16 **UNITED STATE DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**
18

19 MICHAEL EDENBOROUGH, individually) Case No: 3:16-CV-02233-JST
20 and on behalf of all others similarly situated,)
21 Plaintiff,) CLASS ACTION
22 vs.) **JOINT NOTICE OF SETTLEMENT AND**
23 ADT, LLC d/b/a ADT SECURITY) **STIPULATED REQUEST FOR STAY;**
SERVICES, INC. a Florida limited liability) **PROPOSED ORDER**
24 company,) **(L.R. 7-12)**
25 Defendants.) Hon. Jon S. Tigar
26)
27)
28)

1 The parties to the above-captioned action (the “California Action”) hereby notify the
2 Court that they have through JAMS mediation reached an agreement to settle on a nationwide
3 settlement class basis the claims alleged in this California Action and in the following related
4 actions:

- 5 • *Dale Baker v. The ADT Corporation and ADT, LLC d/b/a ADT Security*
6 *Services*, Case No. 15-cv-02038-CSB-DGB (USDC CD Illinois);
- 7 • *Janet Cheatham v. ADT Corporation and ADT LLC.*, Case No. 2:15-cv-02137-
8 DGC (USDC Arizona);
- 9 • *Santiago L. Hernandez v. ADT, LLC d/b/a ADT Security Services*, Case No.
10 50-2016-CA-002944XXXXMB (Cir. Ct. 15th Jud. Cir. Florida); and
- 11 • *Patricia Wilson v. The ADT Corporation and ADT, LLC d/b/a ADT Security*
12 *Services*, Case No. 50-2016-CA-004410XXXXMB (Cir. Ct. 15th Jud. Cir.
13 Florida)

14 (collectively, the “Actions”). All parties in all the Actions have executed a Memorandum of
15 Understanding memorializing the fundamental terms of the proposed class settlement, to be
16 more formally documented in a Stipulation of Settlement and then submitted for court
17 approval pursuant to Rule 23(e), *Federal Rules of Civil Procedure*.

18 If approved, the settlement will result in the dismissal with prejudice of all claims
19 alleged in this California Action. However, should final approval not be attained for any
20 reason, the Memorandum of Understanding contemplates restoration without prejudice of all
21 parties in all Actions to the positions in which they stood immediately prior to their reaching
22 the settlement. The parties therefore agreed to an immediate and complete stay in all the
23 Actions except to the extent necessary to obtain approval of the settlement. The parties
24 accordingly jointly and respectfully request that the above-captioned California Action be
25 stayed pending completion of the settlement approval process.

26 The parties propose filing a status report with this Court on March 17, 2017, and every
27 90 days thereafter.

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SO STIPULATED.

Dated: January 24, 2017.

CHAVEZ & GERTLER LLP
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FRIEDMAN & BALINT, P.C.
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PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Hon. Jon S. Tigar
U.S. District Court Judge

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SIGNATURE ATTESTATION

I, Nance F. Becker, am the ECF User whose ID and password are being used to file this JOINT NOTICE OF SETTLEMENT AND STIPULATED REQUEST FOR STAY; PROPOSED ORDER. In compliance with Local Rule 5-1(i)(3), I hereby attest that Defendants' counsel have concurred in this filing.

DATED: January 24, 2017

CHAVEZ & GERTLER, LLP

By: /s/ Nance F. Becker

NANCE F. BECKER

Attorneys for Plaintiff
Michael Edenborough and the
Proposed Class