

1 **KAZEROUNI LAW GROUP, APC**

2 Abbas Kazerounian, Esq. (SBN: 249203)

3 ak@kazlg.com

4 Andrei Armas, Esq. (SBN: 299703)

5 Andrei@kazlg.com

6 245 Fischer Avenue, Suite D1

7 Costa Mesa, CA 92626

8 Telephone: (800) 400-6808

9 Facsimile: (800) 520-5523

10 **HYDE & SWIGART**

11 Joshua B. Swigart, Esq. (SBN: 225557)

12 josh@westcoastlitigation.com

13 2221 Camino Del Rio South, Suite 101

14 San Diego, CA 92108

15 Telephone: (619) 233-7770

16 Facsimile: (619) 297-1022

17 *Attorneys for Plaintiffs*

18 Mara W. Murphy (State Bar No. 185902)

19 David A. Forkner (*pro hac vice*)

20 Eli S. Schlam (*pro hac vice*)

21 WILLIAMS & CONNOLLY LLP

22 725 Twelfth Street, N.W.

23 Washington, DC 20005

24 Telephone: (202) 434-5000

25 Fax: (202) 434-5029

26 E-mail: mmurphy@wc.com

27 E-mail: dforkner@wc.com

28 E-mail: eschlam@wc.com

Jeffrey E. Faucette (State Bar No. 193066)

SKAGGS FAUCETTE LLP

One Embarcadero Center, Suite 500

San Francisco, CA 94111

Telephone: (415) 315-1669

Facsimile: (415) 433-5994

E-mail: jeff@skaggsfaucette.com

Attorneys for Defendants Mars, Incorporated

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

ERIC LANKENAU-RAY, Individually And
On Behalf Of All Others Similarly Situated,

Plaintiffs,

v.

MARS, INC.,

Defendant.

Case No.: 4:16-cv-2660-YGR

PUTATIVE CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER STAYING PROCEEDINGS
PENDING FILING OF DISMISSAL**

WHEREAS Plaintiff filed his First Amended Complaint on September 19, 2016;

WHEREAS Defendant’s response to the First Amended Complaint is due on October 6, 2016;

WHEREAS the Case Management Conference is currently scheduled for October 17, 2016;

WHEREAS on July 29, 2016 the Court granted the parties’ request to extend the deadlines for briefing Defendant’s Motion to Dismiss and continued the Case Management Conference in order to allow the parties time to engage in discussions aimed at resolving the litigation;

WHEREAS the parties engaged in discussions and have agreed in principle upon a resolution of the litigation; and

WHEREAS the parties anticipate being able to finalize the terms of their resolution of this litigation within 30 days, at which time the parties will file a stipulation of dismissal of this action with prejudice;

NOW THEREFORE, ALL PARTIES, BY AND THROUGH THEIR COUNSEL, hereby stipulate, and respectfully request that:

All pending deadlines and events, including the Case Management Conference and all related deadlines, shall be stayed. This stay shall be in effect for 30 days from the entry of this Order, or until further order of the Court.

1 IT IS SO STIPULATED.

2 Dated: September 22, 2016

KAZEROUNI LAW GROUP, APC

3 By: /s/Abbas Kazerounian

4 Abbas Kazerounian

Counsel for Plaintiffs

5 WILLIAMS & CONNOLLY LLP

6 By: /s/Eli S. Schlam

7 Eli S. Schlam

8 Counsel for Defendant Mars, Incorporated

9
10 **[PROPOSED] ORDER**

11 PURSUANT TO STIPULATION, IT IS SO ORDERED.

12 Date _____

13 _____
14 Hon. Yvonne Gonzalez Rogers
United States District Judge