

Matthew S. Parmet (SBN 296742)  
[matt@parmet.law](mailto:matt@parmet.law)  
PARMET PC  
340 S. Lemon Ave., #1228  
Walnut, CA 91789  
Telephone: 713.999.5228  
Facsimile: 713.999.1187

*Local Counsel for Plaintiffs*

\*Don J. Foty  
[dfoty@hftrialfirm.com](mailto:dfoty@hftrialfirm.com)  
\*David W. Hodges  
[dhodges@hftrialfirm.com](mailto:dhodges@hftrialfirm.com)  
HODGES & FOTY, LLP  
2 Greenway Plaza, Suite 250  
Houston, Texas 77046  
Telephone: 713.523.0001  
Facsimile: 713.523.1116

*Attorneys for Plaintiffs Boone and Rivera*

*\*Admitted pro hac vice*

(Additional Counsel Listed on Following Page)

Bradley J. Hamburger (SBN 266916)  
[bhamburger@gibsondunn.com](mailto:bhamburger@gibsondunn.com)  
Tiffany Phan (SBN 292266)  
[tphan@gibsondunn.com](mailto:tphan@gibsondunn.com)  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, CA 90071-3197  
Telephone: 213.229.7000  
Facsimile: 213.229.7520

\*Andrew G.I. Kilberg  
[akilberg@gibsondunn.com](mailto:akilberg@gibsondunn.com)  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036-5306  
Telephone: 202.955.8500  
Facsimile: 202.467.0539

*Attorneys for Defendant*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

HEATHER BOONE and ROXANNE  
RIVERA, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

CRISTIAN BARRERA, individually,

Plaintiff

v.

AMAZON.COM SERVICES, LLC,

Defendant.

**JOINT STIPULATION TO EXTEND THE  
DEADLINE TO FILE DISPOSITIONAL  
PAPERS AND [PROPOSED] ORDER**

Case No. 1:21-CV-00241-ADA-BAM – LEAD  
Case No. 1:22-CV-00146-ADA-BAM-MEMBER

1 **Additional Counsel:**

2 Michael Nourmand (SBN 198439)  
3 [mnourmand@nourmandlawfirm.com](mailto:mnourmand@nourmandlawfirm.com)

4 James A. De Sario (SBN 262552)  
5 [jdesario@nourmandlawfirm.com](mailto:jdesario@nourmandlawfirm.com)

6 Kyle J. Ignatius (SBN 348857)  
7 [kignatius@nourmandlawfirm.com](mailto:kignatius@nourmandlawfirm.com)

8 THE NOURMAND LAW FIRM, APC  
9 8822 West Olympic Boulevard

10 Beverly Hills, CA 90211  
11 Telephone: 310.553.3600

12 Facsimile: 310.553.3603

13 *Attorneys for Plaintiff Cristian Barrera*

1 Plaintiffs Heather Boone, Roxanne Rivera, and Cristian Barrera and Defendant Amazon.com  
2 Services LLC (collectively, the “Parties”), by and through their undersigned counsel of record, hereby  
3 stipulate and request as follows:

4 WHEREAS, on August 22, 2023, the Parties submitted a Notice of Settlement informing the  
5 Court that they had reached a tentative settlement;

6 WHEREAS, on August 23, 2023, the Court, pursuant to Local Rule 160, ordered that the Parties  
7 file appropriate papers to dismiss or conclude this action in its entirety by September 12, 2023;

8 WHEREAS, the Parties need to complete negotiations over the contents of a detailed long-form  
9 settlement agreement;

10 WHEREAS, Plaintiffs additionally must prepare a motion for preliminary approval of a class-  
11 wide settlement to address the claims of more than 230,000 putative class members;

12 WHEREAS, the Parties are working diligently to complete the necessary dispositional papers  
13 to submit to the Court, but, in light of these circumstances above, require additional time to complete  
14 that work;

15 WHEREAS, the Parties respectfully submit that good cause exists for an extension of the  
16 deadline to file dispositional papers with the Court, *see* Local Rule 160(b);

17 THEREFORE, IT IS STIPULATED AND REQUESTED THAT, by and between the  
18 undersigned counsel, and subject to the Court’s approval, good cause exists to extend the  
19 September 12, 2023 deadline by 62 days such that the Parties may file appropriate papers to dismiss or  
20 conclude this action in its entirety by November 13, 2023.

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1 AGREED TO BY:

2 Dated: September 1, 2023

HODGES & FOTY, LLP

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4 By: /s/ Don J. Foty  
5 Don J. Foty (admitted *pro hac vice*)  
6 David W. Hodges (admitted *pro hac vice*)

7 *Attorneys for Plaintiffs Heather Boone and Roxanne*  
8 *Rivera*

9 Dated: September 1, 2023

GIBSON, DUNN & CRUTCHER LLP

10 By: /s/ Bradley J. Hamburger  
11 Bradley J. Hamburger  
12 Tiffany Phan  
13 Andrew G.I. Kilberg (admitted *pro hac vice*)

14 *Attorneys for Defendant Amazon.com Services LLC*

15 Dated: September 1, 2023

THE NOURMAND LAW FIRM, APC

16 By: /s/ Kyle J. Ignatius  
17 Michael Nourmand  
18 James A. De Sario  
19 Kyle J. Ignatius

20 *Attorney for Plaintiff Cristian Barrera*

**[PROPOSED] ORDER**

Pursuant to the Parties' Joint Stipulation to Extend the Deadline to File Dispositional Papers,  
IT IS ORDERED that good cause exists to extend the deadline to file dispositional papers.

The Parties must file dispositional papers no later than November 13, 2023.

Dated this \_\_\_ day of \_\_\_\_\_, 2023.

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BARBARA A. MCAULIFFE  
UNITED STATES MAGISTRATE JUDGE

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