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Filed  
October 20, 2021  
Clerk of the Court  
Superior Court of CA  
County of Santa Clara  
2015-1-CV-284956  
By: rwalker

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

16 **COUNTY OF SANTA CLARA**

17 EILEEN A. STAATS, on behalf of herself and all  
18 others similarly situated,

19 Plaintiffs,

20 v.

21 CITY OF PALO ALTO, and DOES 1 through 100,  
22 inclusive,

23 Defendants.

CASE NO. 1-15-CV-284956

**STIPULATION AND [PROPOSED]  
ORDER RE NEW HEARING DATE FOR  
PLAINTIFF'S MOTION FOR FINAL  
APPROVAL OF SETTLEMENT AND  
MOTION FOR ATTORNEYS' FEES,  
COSTS, AND INCENTIVE PAYMENT**

Action Filed: August 17, 2015

Assigned for All Purposes to the  
Honorable Sunil R. Kulkarni, Department 1

1 This stipulation is entered into between Plaintiff Eileen A. Staats (“Plaintiff”) and Defendant City  
2 of Palo Alto (the “City”) (collectively, the “Parties”), by and through their attorneys of record.

3 **RECITALS**

4 1. On September 3, 2021, the Court issued an order tentatively granting Plaintiff’s motion  
5 for final approval of the Parties’ class action settlement agreement and Plaintiff’s motion for attorneys’  
6 fees, costs, and an incentive payment, subject to certain modifications (“Plaintiff’s motions”). The Court  
7 also directed Plaintiff to submit an accounting of claims from the Court-appointed claims administrator,  
8 JND Legal Administration (“JND”). To allow time to prepare this accounting, the Court continued the  
9 hearing on Plaintiff’s motions to December 16, 2021. It also invited the Parties to request an earlier date.


10 2. JND has completed its accounting of the claims. The accounting is included in the  
11 Declaration of Peter Demers Regarding Notice Administration, to be filed along with this stipulation.

12 **STIPULATION**

13 Plaintiff and the City hereby agree, subject to the Court’s approval, that the Court should re-set  
14 the continued hearing on Plaintiff’s motions to November 18, 2021 at 1:30 p.m.

15 SLOVAK, BARON, EMPEY, MURPHY  
16 & PINKNEY, LLP

17  
18 Dated: October 19, 2021

19 By:  for S.S. \_\_\_\_\_  
20 Thomas S. Slovak  
21 Stephen J. Schultz

22 STEELE COOPER LAW


23  
24 Dated: October 19, 2021

25 By:  \_\_\_\_\_  
26 Alexandra T. Steele

27 Attorneys for Plaintiff Eileen A. Staats

28 JARVIS, FAY & GIBSON, LLP

Dated: October 19, 2021

By:  \_\_\_\_\_  
Gabriel McWhirter  
Attorneys for Defendant CITY OF PALO ALTO


1 **[PROPOSED] ORDER**

2 Pursuant to the stipulation between Plaintiff Eileen A. Staats and Defendant City of Palo Alto,  
3 and for good cause shown, the Court hereby orders as follows:

4 1. The continued hearing on Plaintiff’s motion for final approval of the Parties’ class action  
5 settlement agreement and Plaintiff’s motion for attorneys’ fees, costs, and an incentive payment is reset  
6 to November 18, 2021 at 1:30 p.m.

7 **IT IS SO ORDERED.**

8  
9 Dated: October 20, 2021

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11 \_\_\_\_\_  
12 Hon. Sunil R. Kulkarni  
13 Judge of the Superior Court  
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1 PROOF OF SERVICE  
2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 At the time of service, I was over 18 years of age and not a party to this action. I am  
4 employed in the County of Los Angeles, State of California. My business address is 175 S. El  
5 Molino Ave., Suite 9, Pasadena, CA 91101.

6 On October 20, 2021, I served true copies of the following document(s) described as  
7 STIPULATION AND [PROPOSED] ORDER RE NEW HEARING DATE FOR PLAINTIFF'S MOTION  
8 FOR FINAL APPROVAL OF SETTLEMENT AND MOTION FOR ATTORNEYS' FEES, COSTS, AND  
9 INCENTIVE PAYMENT on the interested parties in this action as follows:

10 Benjamin P. Fay  
11 Gabriel McWhirter  
12 JARVIS, FAY, DOPORTO & GIBSON, LLP  
13 492 Ninth Street, Suite 310  
14 Oakland, CA 94607  
15 Telephone: (510) 238-1400  
16 Facsimile: (510) 238-1404  
17 [bfay@jarvisfay.com](mailto:bfay@jarvisfay.com)

18 Attorneys for Defendant CITY OF PALO ALTO

19 **XX BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the  
20 document(s) to be sent from e-mail address alex@steelecooperlaw.com to the persons at the e-  
21 mail addresses listed in the Service List. I did not receive, within a reasonable time after the  
22 transmission, any electronic message or other indication that the transmission was unsuccessful.

23 I declare under penalty of perjury under the laws of the State of California that the  
24 foregoing is true and correct.

25 Executed on October 20, 2021, at Pasadena, California.

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\_\_\_\_\_  
Alexandra T. Steele