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FILED
ALAMEDA COUNTY

FEB 21 2014

By

FILED BY FAX
ALAMEDA COUNTY
February 20, 2014
CLERK OF
THE SUPERIOR COURT
By Burt Moskaira, Deputy
CASE NUMBER:
RG13677358

Attorneys for Petitioner

Christopher C. Jagard, Acting Chief Counsel, SBN 191147
CJagard@dir.ca.gov
Gary O'Mara, Counsel, SBN 104761
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California Department of Industrial Relations
1515 Clay Street, Ste. 701
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Facsimile No. (510) 286-1220

Attorneys for Respondents

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA

REDFLEX TRAFFIC SYSTEMS, INC.,

Petitioner,

v.

CALIFORNIA STATE LABOR
COMMISSIONER, JULIE SU; CALIFORNIA
DIRECTOR OF THE DEPARTMENT OF
INDUSTRIAL RELATIONS CHRISTINE
BAKER; CALIFORNIA DEPARTMENT OF
INDUSTRIAL RELATIONS; and DOES 1
through 25, inclusive,

Respondents.

No. RG13677358

Assigned to Hon. Evelio Grillo

STIPULATED MOTION TO STAY
PROCEEDINGS; ~~PROPOSED~~ ORDER

1 TO THE HONORABLE COURT:

2 Christopher Jagard, counsel for Respondents and Scott Osborne, counsel for Petitioner,
3 respectfully move this Court for an order staying all proceedings in this case for 120 days from
4 the date of the order hereon, or until either party files a request for a scheduling conference.
5 Counsel further request that this Court delay issuing a scheduling or briefing order and either
6 delay or vacate the current Case Management Conference and trial set for February 26, 2014 in
7 this matter.

8 The reasons that the parties are requesting a stay are (1) there is a reasonable chance that
9 this matter will be informally resolved through negotiations with the Department of Industrial
10 Relations together with various civil wage and penalty assessments that are pending against
11 Petitioner and (2) in the event said negotiations are not successful in resolving this matter,
12 Petitioner intends to seek to join related civil wage and penalty assessment appeals with the
13 current action in order to utilize the Court's time in the most efficient manner.

14 IT IS HEREBY STIPULATED AND AGREED by and between the Parties through their
15 respective counsel of record:

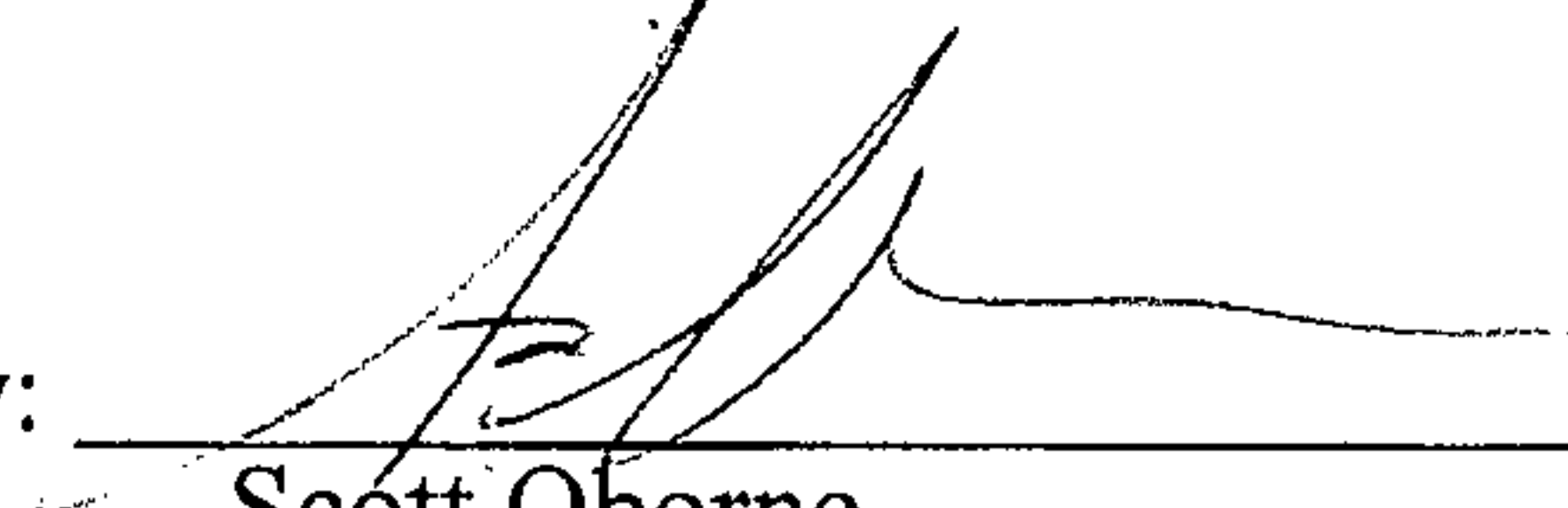
- 16 1. That all proceedings in this action shall be stayed for a period of 120 days from the
17 date of the order hereon.
- 18 2. The current Case Management Conference and trial set for February 26, 2014 be
19 vacated or set over accordingly pursuant to the stay.

20 IT IS SO STIPULATED:
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Date: February 19, 2014

JACKSON LEWIS P.C.

By: 

Scott Osborne
Attorneys for Petitioner
REDFLEX TRAFFIC SYSTEMS, INC.

Date: February __, 2014

CALIFORNIA DEPARTMENT OF
INDUSTRIAL RELATIONS

By: _____

Christopher C. Jagard, Acting Chief Counsel
Attorneys for Respondents

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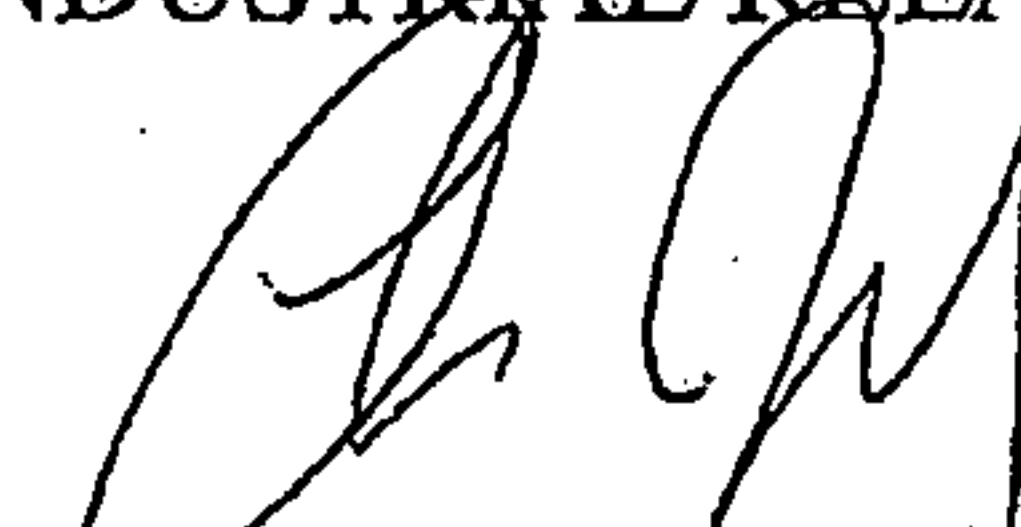
Date: February __, 2014

JACKSON LEWIS P.C.

By: _____
Scott Osborne
Attorneys for Petitioner
REDFLEX TRAFFIC SYSTEMS, INC.

Date: February 18, 2014

CALIFORNIA DEPARTMENT OF
INDUSTRIAL RELATIONS


By:  _____
Christopher C. Jagard, Acting Chief Counsel
Attorneys for Respondents

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[PROPOSED] ORDER

Based on this Stipulation of the Parties and for good cause shown, it is hereby ordered that the terms of this Stipulation are approved and adopted, and all proceedings in this action shall be stayed for a period of 120 days from the date of this order. Additionally, the current Case Management Conference set for February 26, 2014 is vacated, *and reset for 6-26-14 at 1:30 pm in Dept. 31*
THE FOREGOING STIPULATION IS APPROVED AND IS SO ORDERED.

Dated: **FEB 21 2014**



Judge of the Superior Court

EVELIO M. GRILLO

4818-8379-7528, v. 1