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DEC 14 2011

LOS ANGELES
SUPERIOR COURT

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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 COUNTY OF LOS ANGELES

10 MICHAEL J. HOLLAND, DAVID
11 RICHARDSON and GERALDINE EVANS,

12 Plaintiffs,

13 vs.

14 SECURITAS SECURITY SERVICES USA,
15 INC.,

16 Defendants.

17 WALTER LINARES, CHARLES DUNAWAY,
and SANDRA BLACKSHER,

18 Plaintiffs,

19 vs.

20 SECURITAS SECURITY SERVICES USA,
21 INC.,

22 Defendants.

23 BHRISTINE BRISCO,

24 Plaintiffs,

25 vs.

26 SECURITAS SECURITY SERVICES USA,
27 INC.,

28 Defendants.

CASE NO.: BC394708
Related to Case No. BC41655 and BC432135

CLASS ACTION

Assigned for All Purposes to
Hon. Jane L. Johnson
Dept. 308

STIPULATION AND ~~ORDER~~
ORDER REGARDING PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION

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Additional Counsel:

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RECITALS

Holland, et. al. vs. Securitas Security Services, USA, Inc.

1. On February 18, 2011, Plaintiffs Michael J. Holland, David Richardson and Geraldine Evans (“the Holland Plaintiffs”), filed a Motion for Class Certification (“Motion”).
2. On June 10, 2011, Defendant Securitas Security Services USA, Inc. (“Defendant”), filed its Opposition to Plaintiffs’ Motion for Class Certification (“Opposition”).
3. After the Holland Plaintiffs received Defendant’s Opposition, Defendant produced additional documents which the Holland Plaintiffs assert are relevant to and support class certification.
4. At the further status conference on December 6, 2011, the Court ordered that the original Motion and Opposition be withdrawn so that the Holland Plaintiffs can file a new Motion, which incorporates both the previously submitted evidence and evidence that was obtained after the original papers were filed.

STIPULATION

Holland, et. al. vs. Securitas Security Services, USA, Inc.

The Holland Plaintiffs and Defendant, through their respective attorneys of record, stipulate that the hearing date for the Holland Plaintiffs’ Motion and the corresponding briefing schedule shall be as follows:

1. The Holland Plaintiffs shall file and serve their Motion for Class Certification on February 15, 2012.
2. Defendant shall file and serve its Opposition to the Holland Plaintiffs’ Motion for Class Certification on March 29, 2012.
3. The Holland Plaintiffs shall file their Reply to Defendant’s Opposition to Holland Plaintiffs’ Motion for Class Certification by April 27, 2012
4. The hearing on the Holland Plaintiffs’ Motion for Class Certification shall take

1 place on May 22, 2012, at 10:00 a.m., in Department 308.

2 If the Court is unavailable for hearing on May 22, 2012, the Parties are agreeable to have
3 the hearing on the Holland Motion for Class Certification continued to a date thereafter. The
4 parties also agree that they may, either jointly or individually, seek a further continuance of the
5 above schedule if the California Supreme Court does not issue its decision in Brinker Restaurant
6 Corp. et al. v. Superior Court of San Diego (S166350) by early February, 2012, as currently
7 scheduled, as the parties believe that the decision in that case may impact the analysis of the
8 Holland Motion.

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10 **RECITALS**

11 **Walter Linares, et. al. vs. Securitas Security Services, USA, Inc.**

- 12 1. On June 14, 2011, Plaintiffs Walter Linares, Charles Dunaway and Sandra
13 Blacksher (“the Linares Plaintiffs”), filed a Motion for Class Certification
14 (“Motion”).
- 15 2. On October 31, 2011, Defendant Securitas Security Services USA, Inc.
16 (“Defendant”), filed its Opposition to Plaintiffs’ Motion for Class Certification
17 (“Opposition”), pursuant to stipulated order granting Defendant additional time to
18 engage in discovery and file the Opposition.
- 19 3. On December 7, 2011, counsel for Defendant, counsel for the Holland Plaintiffs,
20 and counsel for the Linares Plaintiffs had a conference call and conferred at length
21 on further scheduling.
- 22 4. Defendant’s Opposition includes approximately 85 declarations of putative class
23 members and a lengthy report by Defendant’s expert. The Linares Plaintiffs have
24 determined that they need additional discovery for their Reply to the Opposition,
25 including:
26 a. The deposition of Defendant’s expert.
27 b. Depositions of approximately 20 of the putative class members whose
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1 declarations Defendant filed with the Opposition.

2 c. Requests for production of discipline records, personnel files, and possibly
3 other documents.

4 d. Interrogatories concerning work time at branch offices in light of the
5 Opposition and the declarations and other evidence submitted with the
6 opposition records.

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8 **STIPULATION**

9 **Walter Linares, et. al. vs. Securitas Security Services, USA, Inc.**

10 The Linares Plaintiffs and Defendant stipulate as follows:

- 11 1. The Linares Plaintiffs shall file their Reply to Defendant's Opposition by May 1,
12 2012.
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14 2. The hearing on the Linares Plaintiffs' Motion shall be on the same date and time as
15 the hearing on the Holland Motion for Class Certification.

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17 **RECITALS**

18 **Bristine Brisco, et. al. vs. Securitas Security Services, USA, Inc.**

- 19
20 1. On December 7, 2011, counsel for Defendant, Plaintiff's counsel in the Holland
21 and Linares Plaintiffs had a conference call and conferred at length on further
22 scheduling.
23 2. Plaintiff's counsel will be propounding additional discovery; including but not
24 limited to supplemental requests for previous discovery propounded, Demand for
25 Production of Documents, and Special Interrogatories.

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STIPULATION

Bristine Brisco, et. al. vs. Securitas Security Services, USA, Inc.

Plaintiff and Defendant stipulate as follows:

1. Brisco shall file his motion for Class Certification by March 15, 2012. Defendant's opposition shall be due on April 20, 2012, and Plaintiff's reply shall be filed on or before May 8, 2012.
2. The hearing on Brisco's Motion shall be on the same date and time as the hearing on the Holland and Linares Motions for Class Certification.

SIGNATURES OF COUNSEL

DATED: December 13, 2011

WESTRUP KLICK, LLP

By: Phil Poliner /s/
PHILLIP R. POLINER

Attorneys for Plaintiffs Michael J. Holland, David Richardson and Geraldine Evans

DATED: December 12, 2011

SPIRO MOSS LLP

By: Ira Spiro
Ira Spiro

Attorneys for Plaintiffs Walter Linares, Charles Dunaway and Sandra Blacksher

DATED: December 12, 2011

LAW OFFICE OF SHAUN SETAREH

By: _____
Shaun Setareh

Attorneys for Plaintiff, Bhristine Brisco

DEC-13-2011 TUE 12:05 PM SPIRO MOSS LLP

FAX NO. 310 235 2458

P. 07/09

STIPULATION

Bristine Brisco, et al. vs. Securitas Security Services, USA, Inc.

Plaintiff and Defendant stipulate as follows:

1. Brisco shall file his motion for Class Certification by March 15, 2012. Defendant's opposition shall be due on April 20, 2012, and Plaintiff's reply shall be filed on or before May 8, 2012.
2. The hearing on Brisco's Motion shall be on the same date and time as the hearing on the Holland and Linares Motions for Class Certification.

SIGNATURES OF COUNSEL

DATED: December ____, 2011

WESTRUP KLICK, LLP

By:

PHILLIP R. POLNER

Attorneys for Plaintiffs Michael J. Holland, David Richardson and Geraldine Evans

DATED: December 12, 2011

SPIRO MOSS LLP

By:

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Attorneys for Plaintiffs Walter Linares, Charles Dunaway and Sandra Blacksher

DATED: December 12, 2011

LAW OFFICE OF SHAUN SETAREH

By:

Shaun Setareh

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DATED: December 13, 2011

BROWN GITT LAW GROUP, LLP

By:


SHERRY SHAVIT

Attorneys for Defendant Securitas Security Services
USA, Inc.

ORDER

A. Pursuant to the stipulation and agreement of the parties in **Holland vs. Securitas Security Services USA, Inc.** as set forth above, and good cause appearing therefore, IT IS ORDERED that the hearing date for the Holland Plaintiffs' Motion for Class Certification and the corresponding briefing schedule shall be as follows:

1. The Holland Plaintiffs shall file and serve their Motion for Class Certification on February 15, 2012.
2. Defendant shall file and serve its Opposition to the Holland Plaintiffs' Motion for Class Certification on March 29, 2012.
3. The Holland Plaintiff's shall file their Reply to Defendant's Opposition to the Holland Plaintiffs' Motion for Class Certification by April 27, 2012
4. The hearing on the Holland Plaintiffs' Motion for Class Certification shall take place on May 22, 2012, at 10:00 a.m., in Department 308.

The Parties may also, either jointly or individually, seek a further continuance of the above schedule if the California Supreme Court does not issue its decision in Brinker Restaurant Corp. et al. v. Superior Court of San Diego (S166350) by early February, 2012.

B. Pursuant to the stipulation and agreement of the parties in **Linares v. Securitas Security Services USA, Inc.** as set forth above, and good cause appearing therefore, IT IS ORDERED

1. The Linares Plaintiffs shall file their Reply to Defendant's Opposition to Plaintiffs'

Motion for Class Certification by May 1, 2012

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2. The hearing on the Linares Plaintiffs' motion shall take place on May 22, 2012 at 10:00 a.m., in Department 308.

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C. Pursuant to the stipulation and agreement of the parties in **Brisco vs. Securitas Security Services USA, Inc.** as set forth above, and good cause appearing therefore, IT IS ORDERED that the hearing date for Plaintiff Bristine Brisco to file a Motion for Class Certification and the corresponding briefing schedule shall be as follows:

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1. Plaintiff Brisco shall file and serve his Motion for Class Certification by March 15, 2012.
 2. Defendant shall file and serve its Opposition to the Motion for Class Certification by April 20, 2012, and the reply brief shall be filed by May 8, 2012.
 3. The hearing for Class Certification shall take place on May 22, 2012, at 10:00 a.m., in Department 308.

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Dated: DEC 14 2011

JANE L. JOHNSON

HONORABLE JANE L. JOHNSON