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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RENEE FASSBENDER AMOCHAEV,
DEBORAH ORLANDO, KATHRYN N.
VARNER and IVY SO, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

CITIGROUP GLOBAL MARKETS, INC.,
d/b/a SMITH BARNEY,

Defendant.

Case No. C- 05-1298 PJH

CLASS ACTION

**STIPULATION AND [PROPOSED] ORDER
ADJOURNING CLASS CERTIFICATION
SCHEDULE AND SETTING DEADLINE TO
FILE PRELIMINARY SETTLEMENT
APPROVAL PAPERS**

1 WHEREAS, Plaintiffs' Motion for Class Certification is due to be filed on
2 September 13, 2007;

3 WHEREAS, the parties advised the Court by Joint Stipulation dated July 30, 2007
4 that the parties had reached substantive agreements on the monetary terms of the settlement and
5 agreed that a brief extension of the class certification schedule was warranted so that the parties
6 could complete discussions on the programmatic relief to resolve this matter;

7 WHEREAS, the process to resolve this matter has taken longer than anticipated to
8 complete due to the highly complicated nature of the contemplated programmatic relief;

9 WHEREAS, the parties are still considering independent consultants in accordance
10 with the terms agreed to in the programmatic relief;

11 WHEREAS, the parties had a conference call on September 10, 2007 to discuss
12 the remaining outstanding issues and agree that the process is near completion;

13 WHEREAS, the parties have been mediating under the supervision of Hunter R.
14 Hughes, Esq., of Rogers & Hardin LLP, Atlanta, Georgia, who is available to speak with the
15 Court about the progress of the mediation at the Court's convenience at his office number, (404)
16 420-4622 should the Court be interested in speaking with him; and

17 WHEREAS, the parties and their counsel agree that the proposed modification is
18 appropriate and will not unduly delay processing this action,

19 IT IS HEREBY STIPULATED, by and between the parties through their
20 respective counsel of record, that the parties propose the schedule for class certification be
21 adjourned *sine die* and propose that the Court set the deadline for filing Preliminary Settlement
22 Approval papers on October ³¹~~26~~, 2007.

23 SO STIPULATED.
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1 Dated: September 12, 2007

Respectfully submitted,

2 LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP

3
4 By: /s/ Kelly M. Dermody
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27 *Attorneys for Plaintiffs and the Proposed Class*

1 DATED: September 12, 2007

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Jay Cohen

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15 *d/b/a Smith Barney*

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 21, 2007

