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14 UNITED STATES DISTRICT COURT
15 EASTERN DISTRICT OF CALIFORNIA
16 FRESNO DIVISION
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18 SERGIO VEGA, ALFONSO RIVERA, JUAN
19 MORALES, EMILIANO ARMENTA, PEDRO
RIOS, and JOSE NAVA on behalf of themselves
20 and all others similarly situated,

21 PLAINTIFFS,

22 vs.

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24 WEEKS WHOLESALE ROSE GROWER, INC.,
doing business as "Weeks Wholesale Rose Grower"
25 and "Weeks Roses,"

26 DEFENDANT

Case No. 1:07-cv-00225- DLB

CLASS ACTION

**STIPULATION TO EXTEND ALL
DEADLINES IN CASE AND
PROPOSED ORDER**

1 Plaintiffs Sergio Vega, et al. and Defendant Weeks Wholesale Grower Inc., hereby stipulate
2 as follows:

- 3 1. On July 1, 2009, the Court conducted a status teleconference at the parties' request regarding
4 discovery disputes and scheduling of mediation. Following the conference, the Court adopted
5 scheduling deadlines as referenced under the Minutes Order of July 1, 2009 (Doc. 61).
- 6 2. Defendant's current financial status has severely impacted Defendant's ability to litigate all
7 cases against Defendant, including but not limited to the case at present. Stoel Rives, outside
8 and separate counsel for Defendant has unilaterally engaged Plaintiffs' counsel in a global
9 settlement of all claims against Defendant.
- 10 3. The parties previously request a temporary stay of litigation and extension of all key deadlines
11 pending continued due diligence on the part of Plaintiffs' counsel as to the current financial
12 status of Defendant as well as the settlement offer currently on the table.
- 13 4. After meeting and conferring, the parties agree that a 90-day extension of all key deadlines
14 would be practical, efficient, and fair to all parties.
- 15 5. Accordingly, the parties request to extend all key deadlines in the case as follows:

16	Deadline to complete depositions of key parties:	2/16/10
17	Deadline to file motion for class certification:	2/24/10
18	Hearing:	4/06/10
19	Deadline to complete all discovery:	4/26/10
20	Non-Dispositive Motions due by:	4/26/10
21	Hearing:	5/17/10
22	Dispositive motions due by:	6/08/10
23	Hearing:	7/02/10
24	Pretrial conference:	7/16/10, 1:30PM
25	Jury Trial:	9/14/10, 9:00AM, CR 9

26 The parties stipulate as to this new proposed deadlines as set forth above, and respectfully
27 request that this Court sign the below attached proposed order which reflects this change.

28 The parties request that if this court has any questions or concerns with regard to this stipulation,
that a conference call be arranged to address these concerns and to explain further the reasons for

1 this extension.

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DATED: November 24, 2009

LAW OFFICES OF MALLISON & MARTINEZ

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By: /s/ Stan S. Mallison

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Stan S. Mallison

Hector R. Martinez

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Attorneys for Plaintiffs

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DATED: November 24, 2009

THE SAQUI LAW GROUP

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By: /s/ Andrew H. Lee

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Michael C. Saqui

Andrew H. Lee

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Attorneys for Defendant

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The parties having so stipulated and GOOD CAUSE APPEARING, that the schedule for this case is hereby amended as set forth above.

IT IS SO ORDERED.

Dated: December 14, 2009

/s/ Dennis L. Beck
UNITED STATES MAGISTRATE JUDGE