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15 UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF CALIFORNIA
17 FRESNO DIVISION

<p>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,</p> <p>21 PLAINTIFFS,</p> <p>22 vs.</p> <p>23 WEEKS WHOLESALE ROSE GROWER, INC., doing business as "Weeks Wholesale Rose Grower" and "Weeks Roses,"</p> <p>24 DEFENDANT.</p>	<p>Case No. 1:07-cv-00225-DLB</p> <p><u>CLASS ACTION</u></p> <p>STIPULATION TO EXTEND REMAINING CASE DEADLINES AND PROPOSED ORDER</p>
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26 Plaintiffs, Sergio Vega, et al., and Defendant, Weeks Wholesale Rose Grower Inc., hereby
27 stipulate as follows:
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1. Defendant states that its current financial status continues to severely impact its ability to litigate this matter.
2. The parties previously requested a temporary stay of litigation and extension of all key deadlines, which this Court granted by order dated February 24, 2010, pending the parties' March 8, 2010 mediation of this matter with mediator Mark Rudy. While the mediation was not successful in resolving this matter, the mediation assisted both parties in understanding the other's litigation and settlement positions.
3. On April 26, Plaintiffs timely filed a motion for class certification per the Court's order dated February 24, 2010.
4. In order to respond to Plaintiffs' motion for class certification, Defendant believes it is necessary for it to depose approximately 12 of the 29 declarants whose declarations Plaintiffs have submitted in support of their motion for class certification. Plaintiffs dispute Defendant's contention and are only willing to permit three such depositions to be taken, so the issue will likely require the Court's involvement to resolve. In any event, neither party wants to incur additional litigation expenses if this matter can be resolved by settlement, and thus both parties would like a brief period of time to conduct additional settlement discussions, with the help of mediator Mark Rudy (who has already been in contact with both parties), prior to engaging in additional oral discovery and briefing on the motion for class certification.
5. After meeting and conferring, the parties agree that a 30-day to 90-day extension of the remaining case deadlines would be practical, efficient, and fair to all parties.

