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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION**

IN RE TACO BELL WAGE AND
HOUR ACTIONS

) Master File: 1:07-cv-01314-SAB
)
) Hon. Stanley A. Boone

) **STIPULATION TO MODIFY**
) **SCHEDULING ORDER AND**
) **CONTINUE PRE-TRIAL**
) **DEADLINES; ORDER**

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1 Subject to approval by this Court, Plaintiffs Sandrika Medlock and Lisa
2 Hardiman, on the one hand (“Plaintiffs”), and Defendants Taco Bell Corp. and
3 Taco Bell of America, Inc. on the other hand (“Defendants”) (collectively, the
4 “Parties”), by and through their respective counsel, hereby stipulate to the
5 following:

6 1. On December 16, 2014, this Court issued a Scheduling Order (Dkt.
7 No. 521) setting the following pre-trial dates, and trial date:

8	Expert disclosure deadline	June 19, 2015
9	Non-expert discovery deadline	July 3, 2015
10	Non-dispositive motion filing deadline	July 3, 2015
11	Supplemental expert disclosure deadline	August 3, 2015
12	Expert discovery deadline	September 3, 2015
13	Dispositive motion filing deadline	September 3, 2015
14	Joint pre-trial statement deadline	November 6, 2015
15	Deadline for motions in limine	November 20, 2015
16	Deadline for oppositions to motions in limine	December 4, 2015
17	Deadline for replies re motions in limine	December 11, 2015
18	Pre-Trial Conference	December 18, 2015
19	and hearing on Motions in Limine	
20	Trial	February 23, 2016

21 2. The Parties are in the process of conducting and completing discovery
22 in preparation for trial, including the sending of notice to class members. It would
23 be beneficial to the trial preparation and for the furtherance of settlement
24 discussions for both Parties if the Pre-Trial Dates were continued by
25 approximately thirty days each, *while retaining the same trial date of February*
26 *23, 2015.*

27 3. The Parties therefore propose the following modified dates:

28	Expert disclosure deadline	July 20, 2015
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Non-expert discovery deadline	August 3, 2015
Non-dispositive motion filing deadline	August 3, 2015
Supplemental expert disclosure deadline	September 3, 2015
Expert discovery deadline	October 2, 2015
Dispositive motion filing deadline	October 5, 2015
Joint pre-trial statement deadline	November 4, 2015
Deadline for motions in limine	November 18, 2015
Deadline for oppositions to motions in limine	December 2, 2015
Deadline for replies to motions in limine	December 9, 2015
Pre-Trial Conference and hearing on Motions in Limine	January 22, 2016

4. The Parties stipulate that there is good cause to modify the Scheduling Order, and respectfully request that the Court modify the Scheduling order pursuant to Federal Rule of Civil Procedure 16(b)(4). This is the Parties' first request to modify the Scheduling Order.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

IT IS SO ORDERED.

Dated: June 10, 2015


UNITED STATES MAGISTRATE JUDGE

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Dated: June 9, 2015

CAPSTONE LAW APC

By: Matthew Theriault
Matthew T. Theriault
Lead Counsel for the Class

Dated: June 9, 2015

SHEPPARD, MULLIN, RICHTER &
HAMPTON LLP

By: /s/ Tracey A. Kennedy
Tracey A. Kennedy
Nora K. Stiles
Attorneys for Defendants Taco Bell
Corp. and Taco Bell of America, Inc.

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ORDER

Good cause appearing therefore, and pursuant to the parties' stipulation, **IT IS ORDERED THAT** the dates in the Scheduling Order (Dkt. No. 521) shall be modified as follows:

Expert disclosure deadline	July 20, 2015
Non-expert discovery deadline	August 3, 2015
Non-dispositive motion filing deadline	August 3, 2015
Supplemental expert disclosure deadline	September 3, 2015
Expert discovery deadline	October 2, 2015
Dispositive motion filing deadline	October 5, 2015
Joint pre-trial statement deadline	November 4, 2015
Deadline for motions in limine	November 18, 2015
Deadline for oppositions to motions in limine	December 2, 2015
Deadline for replies re motions in limine	December 9, 2015
Pre-Trial Conference and hearing on Motions in Limine	January 22, 2016