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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA AT FRESNO

SABAS ARREDONDO, JOSE CUEVAS,
HILARIO GOMEZ, IRMA LANDEROS, and
ROSALBA LANDEROS individually, and on
behalf of all others similarly situated,

Plaintiffs,

v.

DELANO FARMS COMPANY, a Washington
State Corporation; CAL-PACIFIC FARM
MANAGEMENT, L.P.; T&R BANGI'S
AGRICULTURAL SERVICES, INC., and
DOES 1 through 10, inclusive,

Defendants.

NO. 1:09-cv-01247-MJS

**FIRST STIPULATION TO EXTEND
TIME TO RESPOND TO
PLAINTIFFS' SPECIAL
INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF
DOCUMENTS AND ORDER**

1 **I. JOINT STIPULATION**

2 WHEREAS, Plaintiffs Sabas Arredondo, Jose Cuevas, Hilario Gomez, Irma Landeros,
3 and Rosalba Landeros, individually, and on behalf of all others similarly situated (collectively,
4 “Plaintiffs”) served their Special Interrogatories to Defendant Delano Farms Company, Set
5 No. 2, and Special Interrogatories to Defendant T&R Bangi’s Agricultural Services, Inc., Set
6 No. 2 (collectively, the “Interrogatories”) on June 10, 2013;

7 WHEREAS, Plaintiffs served their Request for Production of Documents to Defendant
8 Delano Farms Company, Set No. 3, and Request for Production of Documents to Defendant
9 T&R Bangi’s Agricultural Services, Inc., Set No. 3 (collectively, the “RFPs”) on June 10,
10 2013;

11 WHEREAS, Federal Rules of Civil Procedure 5, 6, 33, and 34 required Defendants
12 Delano Farms Company and T&R Bangi’s Agricultural Services, Inc. (collectively, the
13 “Defendants”) to respond to the Interrogatories and RFPs by Monday, July 15, 2013;

14 WHEREAS, since mediation, the Parties have tentatively agreed to settle the above-
15 captioned lawsuit, subject to their negotiation of the remaining terms;

16 WHEREAS, the Parties are actively negotiating details related to preparation of a
17 written settlement agreement and preparing drafts thereof;

18 WHEREAS, the Plaintiffs have agreed that the Defendants need not respond to the
19 Interrogatories and RFPs until they are given two weeks’ notice; in furtherance of that
20 agreement, and in order to comply with local rule 144, the parties agree that defendants may
21 have until September 15, 2013 to respond to the outstanding discovery, or until two weeks from
22 the date on which Plaintiffs request that Defendants respond, whichever date is earlier;

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1 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND
2 RESPECTFULLY REQUEST that Defendants may have until September 15, 2013 to respond
3 to the Interrogatories and RFPs or two weeks from the date on which Plaintiffs request that
4 Defendants respond, whichever date is earlier.

5
6 RESPECTFULLY SUBMITTED:

<p>7 SAVITT BRUCE & WILLEY LLP</p> <p>8 By <u> /s/ David N. Bruce </u> 9 David N. Bruce, <i>Pro Hac Vice</i> 10 Miles A. Yanick, <i>Proc Hac Vice</i></p> <p>11 <i>Attorneys for Delano Farms Company</i></p>	<p>GRISWOLD, LASALLE, COBB, DOWD & GIN, LLP</p> <p>By <u> /s/ Michael R. Johnson </u> Michael R. Johnson, State Bar No. 237767</p> <p><i>Attorneys for Cal-Pacific Farm Management, L.P., and T&R Bangi's Agricultural Services, Inc.</i></p>
<p>13 LAW OFFICES OF WILLIAM C. HAHESY</p> <p>14 By <u> /s/ William C. Hahey </u> 15 William C. Hahey, State Bar No. 105743</p> <p>16 <i>Attorneys for Delano Farms Company</i></p>	<p>MYERS, WIDDERS, GIBSON, JONES & FEINGOLD, LLP</p> <p>By <u> /s/ James E. Perero </u> James E. Perero, State Bar No. 258127</p> <p><i>Attorneys for Plaintiffs Sabas Arredondo, et al.</i></p>

1 **ORDER**

2 Based on the foregoing stipulation, the Court hereby orders that Defendants will
3 respond to the Interrogatories and RFPs by September 15, 2013, or two weeks from the date on
4 which Plaintiffs request that Defendants respond, whichever date is earlier.

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7 IT IS SO ORDERED.

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9 Dated: July 24, 2013

10 /s/ Michael J. Seng
11 UNITED STATES MAGISTRATE JUDGE