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11 Attorneys for Plaintiff Dolores Owens,
 individually and on behalf of all others similarly situated

12
 13 **UNITED STATES DISTRICT COURT**
 14 **FOR THE EASTERN DISTRICT OF CALIFORNIA**
 15

16 DOLORES OWENS, individually and)
 on behalf of all others similarly)
 17 situated,)
)
 18 Plaintiff,)
)
 19 vs.)
)
 20 KRAFT FOODS GLOBAL, INC.,)
 21 doing business as KRAFT FOODS,)
 INC. and DOES 1-10 inclusive,)
 22 Defendants.)
 23)
 24)
 25)
 26)
 27)
 28)

Case No.: 1:10-CV-02062-AWI-SMS

**STIPULATED ORDER
 CONTINUING CLASS
 CERTIFICATION DATES**

1 Plaintiff Dolores Owens (“Plaintiff”) and defendant Kraft Foods Global,
2 Inc., doing business as Kraft Foods, Inc. (“Defendant”) (Plaintiff and Defendant are
3 collectively referred to as the “Parties”) enter into the following stipulation, subject
4 to the Court’s approval, to continue dates relating to class certification in response
5 to a medical emergency.

- 6
- 7 1. On March 25, 2011, this Court issued a Preliminary Scheduling and
8 Discovery RE: Class Certification. That Order included the following
9 dates:
- 10 a. Pleading Amendment Deadline: June 30, 2011;
11 b. Plaintiff’s Motion for Class Certification Filing Deadline: November
12 4, 2011;
13 c. Defendant’s Opposition to Class Certification Filing Deadline:
14 December 16, 2011;
15 d. Plaintiff’s Reply to Opposition to Class Certification Filing
16 Deadline: January 27, 2012; and
17 e. Class Certification Hearing: February 27, 2012.
- 18
- 19 2. The Parties have been actively pursuing discovery, including Requests for
20 Production of Documents, Special Interrogatories and Person(s) Most
21 Knowledgeable depositions.
- 22
- 23 3. In or about the week of September 19, 2011, Plaintiff’s counsel Michael L.
24 Carver’s wife was diagnosed with ovarian cancer. Doctors have indicated
25 that the cancer has metastasized and diagnosed it as Stage Four. Treatment
26 began almost immediately at a location approximately four hours away
27 from Mr. Carver’s law practice. In connection with Mr. Carver’s desires to
28 be by his wife’s side during her treatment and to comfort their children, Mr.

1 Carver and Plaintiff have requested that the law firm of Westrup Klick,
2 LLP join this case as Plaintiff's counsel. While Mr. Carver's office will
3 remain as counsel of record, Westrup Klick, LLP will move forward as lead
4 counsel with the prosecution of the case.

5
6 4. Westrup Klick, LLP is and has been in the process of securing and
7 reviewing the files and documents in the case in efforts to become
8 knowledgeable about the claims and facts of the case.

9
10 5. The Parties desire to continue the class certification dates for a period of
11 120 days in order to complete class discovery and the filing of Plaintiff's
12 motion for class certification. In addition, during the continued period, the
13 Parties will make good faith efforts to attend a mediation session using a
14 mutually agreeable mediator. Accordingly, the Parties stipulate to the
15 following continuance:

- 16 a. Plaintiff's Motion for Class Certification Filing Deadline: March 5,
17 2012;
- 18 b. Defendant's Opposition to Class Certification Filing Deadline: April
19 16, 2012;
- 20 c. Plaintiff's Reply to Opposition to Class Certification Filing
21 Deadline: May 28, 2012; and

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1 d. Class Certification Hearing: June 25, 2012.

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3 AGREED AND STIPULATED:

4 WESTRUP KLICK, LLP

5
6 October 5, 2011

7 /s/ R. Duane Westrup
8 R. DUANE WESTRUP
9 Attorneys for Plaintiff Dolores Owens,
10 individually and on behalf of all others
11 similarly situated

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OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

October 5, 2011

/s/ Douglas J. Farmer
DOUGLAS J. FARMER
Attorneys for Defendant Kraft Foods
Global, Inc., doing business as Kraft Foods,
Inc.

ORDER

PURSUANT TO STIPULATION, IT IS ORDERED:

1. Plaintiff's Motion for Class Certification Filing Deadline is CONTINUED to March 5, 2012;
2. Defendant's Opposition to Class Certification Filing Deadline is CONTINUED to April 16, 2012;
3. Plaintiff's Reply to Opposition to Class Certification Filing Deadline is CONTINUED to May 28, 2012; and
4. The Class Certification Hearing is CONTINUED to June 25, 2012.

IT IS SO ORDERED.

Dated: October 11, 2011 /s/ Sandra M. Snyder
UNITED STATES MAGISTRATE JUDGE