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13 UNITED STATES DISTRICT COURT  
 14 EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION

15 CHRISTINA BARBOSA and PATRICIA  
 16 AGUILLERA BARRIOS, on behalf of  
 17 themselves and all similarly situated individuals,

17 Plaintiffs,

18 v.

19 CARGILL MEAT SOLUTIONS CORP., and  
 20 DOES 1-50,

20 Defendants.

Case No. 1:11-cv-00275-LJO-SKO

Hon. Sheila K. Oberto

**STIPULATION TO EXTEND  
 DISCOVERY DEADLINE AND  
 CLASS CERTIFICATION MOTION  
 SCHEDULE BY TWO MONTHS AND  
 ORDER**

Complaint Filed: February 16, 2011  
 Trial Date: Not Set

22 WHEREAS Plaintiffs and Defendant have engaged in written discovery and have worked  
 23 together to schedule depositions in this action;

24 WHEREAS the parties have engaged a private mediator to assist them with settlement  
 25 discussions, having met for a full-day mediation on June 6, 2012 and having thereafter agreed to  
 26 narrow and limit the scope of additional fact discovery before continuing the mediation, and  
 27 counsel wish to stipulate to extend the discovery cut-off date and class certification motion  
 28 schedule to allow them to complete such discovery and fully explore such mediation;

1 WHEREAS, pursuant to this Court's Scheduling Order (Dkt. No. 26), the fact discovery  
2 cut-off date in this case is currently December 7, 2012; the motion for class certification is to be  
3 filed by January 28, 2013, any opposition filed by February 25, 2013, any reply briefs filed by  
4 March 11, 2013 and the motion for class certification to be heard by no later than April 3, 2013;

5 WHEREAS, to allow the parties to complete the agreed upon discovery and fully explore  
6 settlement through mediation, subject to an order from this Court allowing the requested  
7 extensions of time, the parties desire to extend the fact discovery deadline and the other dates  
8 listed above by two months as follows:

- 9 1. Fact discovery deadline shall be February 7, 2013;
- 10 2. Motion for class certification shall be filed by March 28, 2013;
- 11 3. Oppositions to the motion for class certification shall be filed by April 25, 2013;
- 12 4. Any reply brief in support of the motion for class certification shall be filed by May  
13 10, 2013; and
- 14 5. The motion for class certification shall be heard no later than June 3, 2013.

15 **SO STIPULATED.**

16 R. REX PARRIS LAW FIRM  
17 THE DOWNEY LAW FIRM, LLC

18 DATED: July 9, 2012

s/ Daniel Patrick Hunt  
Attorneys for Plaintiffs  
CHRISTINA BARBOSA and PATRICIA  
AGUILLERA BARRIOS

21 MECKLER BULGER TILSON MARICK &  
22 PEARSON LLP

23 DATED: July 10, 2012

s/ Jason E. Barsanti  
Attorneys for Defendant  
CARGILL MEAT SOLUTIONS CORP.

25 IT IS SO ORDERED.

26 Dated: July 11, 2012

/s/ Sheila K. Oberto  
UNITED STATES MAGISTRATE JUDGE