

1 DAVID YEREMIAN & ASSOCIATES, INC.
2 DAVID H. YEREMIAN (SBN 226337)
3 david@yeremianlaw.com
4 HUGO E. GAMEZ (SBN 276765)
5 hugo@yeremianlaw.com
6 535 N. Brand Boulevard, Suite 705
7 Glendale, California 91203
8 Telephone: (818) 230-8380
9 Facsimile: (818) 230-0308

10 Attorneys for Plaintiff LETICIA CEJA-CORONA,
11 on behalf of herself and others similarly situated,

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

15 LETICIA CEJA-CORONA, on behalf of
16 herself and others similarly situated,

17 Plaintiff,

18 v.

19 CVS PHARMACY, INC., a corporation;
20 and DOES 1 through 50, inclusive,

21 Defendants.

Case No. 1:12-CV-01868-AWI-DLB

Courtroom: 2
Judge: Hon. Anthony Ishii

**JOINT STIPULATION TO CONTINUE
ALL DEADLINES; ORDER**

Complaint Filed: October 9, 2012

22 COME NOW Plaintiff Leticia Ceja-Corona and Defendant CVS Pharmacy, Inc. (collectively
23 hereinafter the "Parties"), through their respective counsel of record, and respectfully submit
24 this Joint Stipulation and Proposed Order.

25 The Parties hereby stipulate and agree:

- 26 1. The Parties have agreed to participate in private mediation before Steve Rottman. The
27 earliest date on which Mr. Rottman and the Parties are available is April 8, 2014.
- 28 2. In order to accommodate the Parties' desire to prepare for and participate in
mediation, the Parties respectfully request the Court continue all existing deadlines as
follows:

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- a. Non Expert Discovery deadline to July 7, 2014;
- b. Expert Disclosure deadline to July 7, 2014;
- c. Non Dispositive Motion Filing Deadline (as to Class Certification issues) to July 7, 2013 Hearing pursuant to Local Rules;
- d. Supp. Expert Disclosure deadline to July 28, 2014;
- e. Expert Discovery deadline, including motions to compel related to expert discovery, to August 25, 2014;
- f. Class Certification Motion filing deadline to August 25, 2014;
- g. Class Certification Opposition Motion deadline to September 22, 2014; and
- h. Class Certification Reply deadline to October 13, 2014.

SO STIPULATED.

Dated: January 8, 2014

DAVID YEREMIAN & ASSOCIATES, INC.

By /s/-David Yeremian
 David H. Yeremian
 Attorneys for Plaintiff LETICIA CEJA-CORONA, and the Putative Class

Dated: January 8, 2014

LITTLER MENDELSON, P.C.

By /s/-Jody Landry
 Jody Landry
 Attorneys for Defendant CVS Pharmacy, Inc.

ORDER

The Parties having stipulated to the foregoing, and GOOD CAUSE appearing therefore, IT IS HEREBY ORDERED:

1. The dates indicated below shall be the new deadlines in this matter:
 - a. Non Expert Discovery cut-off July 7, 2014;
 - b. Expert Disclosure July 7, 2014;
 - c. Supp. Expert Disclosure July 28, 2014;
 - d. Expert Discovery deadline, including motions to compel related to expert discovery, to August 25, 2014;
 - e. Non Dispositive Motion Filing Deadline (as to Class Certification issues) to July 7, 2013 Hearing pursuant to Local Rules;
 - f. Class Certification Motion Filing deadline August 25, 2014;
 - g. Class Certification Opposition Motion deadline September 22, 2014; and
 - h. Class Certification Reply deadline October 13, 2014.

IT IS SO ORDERED.

Dated: January 8, 2014



SENIOR DISTRICT JUDGE