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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

12 LUIS CABRALES, on behalf of himself and
13 all others similarly situated,

14 Plaintiff,

15 | vs.

16 CASTLE & COOKE MORTGAGE, LLC, a
Delaware limited liability company,

Defendant.

CASE NO. 14-CV-01138-MCE-JLT

**STIPULATION AND ORDER
REGARDING PREVIOUSLY PROPOSED
FILING DEADLINES**

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1 Plaintiff Luis Cabrales and defendant Castle & Cooke Mortgage, LLC, by and through
2 their respective counsel, hereby stipulate as follows:

3 WHEREAS Plaintiff filed this action on July 21, 2014;

4 WHEREAS Defendant filed a motion to dismiss to the initial complaint on October 27,
5 2014, and a second motion to dismiss to the First Amended Complaint on December 4, 2014;

6 WHEREAS on October 31, 2014, the parties filed a Scheduling Conference Report with
7 certain proposed dates (Dkt. No. 12);

8 WHEREAS in the Scheduling Conference Report, the parties proposed July 31, 2015 as
9 the deadline for filing a motion for class certification;

10 WHEREAS the Court denied Defendant's motion to dismiss on June 12, 2015 and
11 Defendant's answer is due to be filed by June 28, 2015;

12 WHEREAS the parties have propounded and responded to written discovery, have
13 exchanged numerous written meet and confer communications; spent dozens of hours meeting and
14 conferring telephonically; Defendant has produced (and plaintiff has reviewed) over a hundred
15 thousand pages of documents; and the parties are currently in the process of scheduling over a
16 dozen depositions, the majority of which are out of state;

17 WHEREAS the parties need additional time to complete discovery pertaining to the class
18 certification motion and would like to adjust the deadline for filing the motion as follows:

19 Moving papers due by November 2, 2015

20 Opposition papers due by November 30, 2015

21 Reply papers due by December 16, 2015

22 IT IS HEREBY STIPULATED between Plaintiff and Defendant that:

23 1. Any motion for class certification shall be filed by no later than November 2, 2015.

24 2. Any opposition to the class certification motion shall be filed by no later than
25 November 30, 2015.

26 3. Any reply brief to the class certification motion shall be filed by no later than
27 December 16, 2015.

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2 IT IS SO STIPULATED.

3 Dated: June 22, 2015

DOSTART CLAPP HANNINK & COVENY, LLP

5 */s/ Zach P. Dostart*
6 ZACH P. DOSTART
7 Attorneys for Plaintiff

8 Dated: June 22, 2015

SHEPPARD MULLIN RICHTER & HAMPTON, LLP

9 */s/ Theona Zhordania*
10 MARC J. FELDMAN
11 THEONA ZHORDANIA
12 Attorneys for Defendant
13 CASTLE & COOKE MORTGAGE, LLC

14 **ORDER**

15 In view of the parties' signed stipulation, and finding good cause therefor,

16 IT IS HEREBY ORDERED that:

- 17 1. Any motion for class certification shall be filed by no later than November 2, 2015.
- 18 2. Any opposition to the class certification motion shall be filed by no later than
19 November 30, 2015.
- 20 3. Any reply brief to the class certification motion shall be filed by no later than
21 December 16, 2015.

22 IT IS SO ORDERED.

23 Dated: June 30, 2015

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26 MORRISON C. ENGLAND, JR., CHIEF JUDGE
27 UNITED STATES DISTRICT COURT