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Attorneys for Defendant
 SAFEWAY INC.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

ANTHONY PORRECA, et al.

Plaintiffs,

vs.

FLOWERS BAKING CO. OF CALIFORNIA,
 LLC, A LIMITED LIABILITY COMPANY;
 SAFEWAY INC., a corporation; and
 DOES 1 THROUGH 100, inclusive.

Defendants.

CASE NO. 1:15-CV-00732 JAM MJS

**STIPULATION FOR AND ORDER
 CONTINUING SUBMISSION DATE FOR
 JOINT STATUS REPORT TO
 SEPTEMBER 15, 2015**

Plaintiffs, by and through their counsel of record, and defendants FLOWERS BAKING CO. OF CALIFORNIA, LLC, A LIMITED LIABILITY COMPANY (“Flowers”) and SAFEWAY INC. (“Safeway”), stipulate that the Court may enter an order continuing the parties’ time to prepare and submit a Joint Status Report as required by the Court’s June 11, 2015, order in this action, from July 13, 2015 to and including September 15, 2015. The parties believe there is good cause for the Court to enter such an order, for at least the following reasons.

First, defendant Safeway has a motion to dismiss the action as to Safeway on file, and set for hearing on August 5, 2015. Depending on the Court’s ruling on the motion to dismiss, some or all of the claims against Safeway in this action may be eliminated or changed, making

1 the preparation and submission of a discovery plan and the setting of pretrial and trial dates at
2 best premature as to Safeway.

3 Second, the parties have scheduled a mediation session with experienced mediator
4 Michael Dickstein for August 14, 2015. In connection with this mediation, the parties intend to
5 exchange ample informal discovery in order to permit each side to fully evaluate and
6 understand the basis for the claims and defenses at issue in this matter. The parties believe that
7 the preparation and submission of a Joint Status Report on July 13, 2015 would be premature
8 and would impose unnecessary costs and expense upon the parties, given the attempt to resolve
9 this action early, before attorneys' fees and costs make resolution more difficult or impossible.

10 Third, because this action is filed as a Class Action, it may well take more than one
11 mediation session for the parties to fully address all required issues to effectuate a settlement,
12 even assuming that the parties reach agreement on the basic contours of a resolution of this
13 action.

14 Accordingly, the parties respectfully ask the Court to continue their time to submit a
15 Joint Status Report in this action from July 13, 2015 to and including September 15, 2015.

16 Dated: July 10, 2015.

MELLEN LAW FIRM
MATTHEW MELLEN
JESSICA GALLETA

19
20 By _____/s/_____
21 Attorneys for Plaintiffs

22 Dated: July 10, 2015.

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JOHN N. DAHLBERG
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25 By _____/s/_____
26 Attorneys for Defendant Safeway Inc.

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1 Dated: July 10, 2015.

OGLETREE DEAKINS NASH SMOAK
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KEVIN P. HISHTA
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MARGARET S. HANRAHAN

ROBERT A. JONES
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8 By _____/s/_____
Attorneys for Defendant Flowers Baking
Co. of California, LLC

11 **ORDER**

12 The Court, having reviewed the matters submitted in connection with this Stipulation
13 for and [Proposed] Order, and Good Cause appearing, hereby ORDERS that the parties' time to
14 submit a Joint Status Report pursuant to the Court's June 11, 2015 order is extended to
15 September 15, 2015.

18 Dated: July 10, 2015

19 /s/ John A. Mendez
UNITED STATES DISTRICT COURT JUDGE