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9				
10	IN THE UNITED STATES DISTRICT COURT			
11	FOR THE EASTERN DISTRICT OF CALIFORNIA			
12	FRESNO DIVISION			
13	TODD SMITH, individually and on behalf of all others similarly situated,	Case No. 1:15-cv-00744-AWI-SAB		
14	Plaintiff,	STIPULATION AND ORDER EXTENDING TIME		
15	V.			
16	HBS INTERNATIONAL CORP.,			
17	Canadian corporation,			
18	Defendants.			
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The parties are having discussions intended to resolve this matter without further litigation. Therefore, pursuant to Eastern District of California Civil Local Rule 144, Defendant HBS International Corp. and Plaintiff Todd Smith hereby stipulate and respectfully request the Court to order an extension of the deadlines in the case as follows:

	Scheduling Item	Current Deadline	Proposed Deadline
1.	Initial Expert Disclosures	April 1, 2016	May 31, 2016
2.	Supplementary Expert Disclosures:	April 22, 2016	June 21, 2016
3.	Non-Expert Discovery Cutoff	May 2, 2016	July 1, 2016
4.	Expert Discovery Cutoff	May 13, 2016	July 12, 2016
5.	Motions for Class Certification	June 17, 2016	August 16, 2016
6.	Opposition to Class Certification	July 22, 2016	September 20, 2016
7.	Reply to Class Certification	August 16, 2016	October 14, 2016
8.	Oral Argument	August 24, 2016	October 26, 2016

This is the parties' second request for extension. The parties previously sought a 30-day extension of deadlines to accommodate time to respond to discovery over the holidays.

IT IS SO STIPULATED, THROUGH COUNSEL.

Dated: March 15, 2016 **DURIE TANGRI LLP**

> By: _____/s/Michael Feldman MICHAEL A. FELDMAN

> > Attorneys for Defendant HBS INTERNATIONAL CORP.

BARBAT, MANSOUR & SUCIU PLLC Dated: March 15, 2016

> By: /s/ Nick Suciu (as authorized on March 15, 2016) NICK SUCIU

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Ahdoot & Wolfson, P.C. 1016 Palm Avenue West Hollywood, CA 90069 Email: twolfson@ahdootwolfson.com Attorneys for Plaintiff TODD SMITH **FILER'S ATTESTATION** Pursuant to Civil L.R. 131(e), regarding signatures, I, Michael Feldman, attest that concurrence in the filing of this document has been obtained. Dated: March 15, 2016 /s/ Michael Feldman MICHAEL A. FELDMAN IT IS SO ORDERED. Dated: March 15, 2016 UNITED STATES MAGISTRATE JUDGE