

1 (Counsel of record listed on next page)

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UNITED STATES DISTRICT COURT

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EASTERN DISTRICT OF CALIFORNIA

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11 BRUCE KAUFMAN, an individual

No. 2:14-CV-01961 JAM-EFB

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Plaintiff,

Related to Nos.

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vs.

2:13-CV-02439 JAM-EFB

2:14-CV-01946 JAM-EFB;

2:14-CV-01960 JAM-EFB;

2:14-CV-01963 JAM-EFB;

2:14-CV-01965 JAM-EFB;

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RITE AID CORPORATION, and DOES 1
through 50, inclusive,

2:15-CV-00623 JAM-EFB;

2:15-CV-02150 JAM-EFB;

2:15-CV-02396 JAM-EFB;

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Defendants

1:15-CV-01748 JAM-EFB;

2:15-CV-02597 JAM-EFB;

17

1:15-CV-01872 JAM-EFB;

18

1:15-CV-01874 JAM-EFB;

19

2:15-CV-02594 JAM-EFB;

20

2:16-CV-00174 JAM-EFB;

2:16-CV-00211 JAM-EFB;

2:16-CV-01028 JAM-EFB.

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**STIPULATION TO EXTEND DISCOVERY
AND RELATED DEADLINES**

22

Judge: Hon. John A. Mendez

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1 Plaintiffs Bruce Kaufman, Chris Gonzalez, Kathryn Van Kopp, Keith Welday, Tom Bauser,
2 Mark Jaeger, Paul Neumann, Linda Willis, Akindale Carter, Bernadette Carter, Mike Campbell, Bart
3 Hillard, Joshua Roach, Gary Williams, Robert Hollandsworth, Louis Serpa, Agnes Marcallino, Bryce
4 Williams, Ramon Hurtado, Elaheh Salehi, Shannon Betts, Lisa Ladner, and Caren Winegarner
5 (“Plaintiffs”) and defendant Rite Aid Corporation (“Rite Aid”), acting through their respective counsel
6 of record, hereby stipulate, and respectfully request, that the Court grant a two-month extension of
7 discovery and all related deadlines for all related cases that do not currently have a trial date.

8 In support of their request, the parties stipulate as follows:

9 1. On June 9, 2016, this Court entered a scheduling order (ECF 46). The scheduling order
10 set April 28, 2017, for the close of discovery for all related cases, and October 23, 2017, as the trial date
11 for *Bruce Kaufman v. Rite Aid Corp.*, No. 2:14-CV-01961 JAM-EFB; *Chris Gonzalez v. Rite Aid Corp.*,
12 No. 2:14-CV-01963 JAM-EFB; and *Kathryn Van Kopp v. Rite Aid Corp.*, No. 2:14-CV-01965 JAM-
13 EFB. June 9, 2016 Order, at 5, 8. No other trial dates have been set.

14 2. On March 21, 2017, the parties filed a joint stipulation to extend discovery and related
15 deadlines in those cases without trial dates. On March 22, 2017, the Court granted that stipulation and
16 entered an order (ECF 51) extending the close of discovery from April 28, 2017, to July 28, 2017; the
17 deadline for dispositive motions from July 11, 2017, to October 10, 2017; and the hearing date for
18 dispositive motions from August 8, 2017, to November 7, 2017. This is the only discovery extension
19 previously sought or granted in these matters.

20 3. The parties do not seek a discovery extension for *Kaufman*, *Gonzalez* or *Van Kopp* (*i.e.*,
21 the cases in which a trial date has been set). This stipulation will not therefore delay trial.

22 4. The parties and their undersigned counsel currently are preparing for the *Kaufman*,
23 *Gonzalez*, and *Van Kopp* trials scheduled for this year. The parties are also actively engaged in
24 completing discovery for the 14 other matters not scheduled for trial. The parties have diligently
25 pursued discovery in these matters, have taken numerous depositions, have served and responded to
26 written discovery, and have produced thousands of documents. The parties are attempting to complete
27 all remaining depositions as expeditiously as possible, and have exchanged deposition dates for tens of
28 depositions in the next two months.

1 5. In order to complete the many depositions needed in these related cases, and to
2 accommodate the calendars and travel schedules of parties and their counsel, as well as third party
3 witnesses, the parties therefore agree and respectfully request that the Court extend the discovery
4 completion deadline, and all related deadlines, in the following 14 actions not yet scheduled for trial:

- 5 ▪ *Keith Welday v. Rite Aid Corp.*, No. 2:13-CV-02439 JAM-EFB;
- 6 ▪ *Tom Bauser v. Rite Aid Corp.*, No. 2:14-CV-01946 JAM-EFB;
- 7 ▪ *Mark Jaeger v. Rite Aid Corp.*, No. 2:14-CV-01960 JAM-EFB;
- 8 ▪ *Paul Neumann v. Rite Aid Corp.*, No. 2:15-CV-00623 JAM-EFB;
- 9 ▪ *James Kilgore et al. v. Rite Aid Corp.*, No. 2:15-CV-02150 JAM-EFB;
- 10 ▪ *Mike Campbell v. Rite Aid Corp.*, No. 2:15-CV-02396 JAM-EFB;
- 11 ▪ *Bart Hillard et al. v. Rite Aid Corp.*, No. 1:15-CV-01748 JAM-EFB;
- 12 ▪ *Robert Hollandsworth v. Aid Corp.*, No. 2:15-CV-02597 JAM-EFB;
- 13 ▪ *Destrea Bell et al. v. Rite Aid Corp.*, No. 1:15-CV-01872 JAM-EFB;
- 14 ▪ *Bryce Williams v. Rite Aid Corp.*, No. 1:15-CV-01874 JAM-EFB;
- 15 ▪ *Ramon Hurtado v. Rite Aid Corp.*, No. 2:15-CV-02594 JAM-EFB;
- 16 ▪ *Elaheh Salehi et al. v. Rite Aid Corp.*, No. 2:16-CV-00174 JAM-EFB;
- 17 ▪ *Lisa Ladner v. Rite Aid Corp.*, No. 2:16-CV-00211 JAM-EFB; and
- 18 ▪ *Caren Winegarner v. Rite Aid Corp.*, No. 2:16-CV-01028 JAM-EFB.

19 6. The parties respectfully request that the Court extend the deadlines in the cases listed
20 above in paragraph 5, as follows:

- 21 ▪ Close of discovery extended from July 28, 2017, to September 29, 2017;
- 22 ▪ Dispositive motion deadline extended from October 10, 2017, to December 8, 2017; and
- 23 ▪ Dispositive motion hearing date extended from November 7, 2017, to January 9, 2018.

24 This stipulation is filed by Justin M. Scott. All other signatories listed, and on whose behalf the
25 filing is submitted, concur in the filing's content and have authorized this filing.

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Dated: June 14, 2017.

MATTHEW RIGHETTI
JOHN GLUGOSKI
MICHAEL RIGHETTI
RIGHETTI GLUGOSKI, P.C.

By: /s/ Michael Righetti
 Michael Righetti
 Attorneys for Plaintiffs

Dated: June 14, 2017.

JEFFREY D. WOHL
JUSTIN M. SCOTT
PAUL HASTINGS LLP

By: /s/ Justin M. Scott
 Justin M. Scott
 Attorneys for Defendant Rite Aid Corporation

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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
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11 BRUCE KAUFMAN, an individual

12 Plaintiff,

13 vs.
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15 RITE AID CORPORATION, and DOES 1
16 through 50, inclusive,

17 Defendants
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No. 2:14-CV-01961 JAM-EFB

Related to Nos.

2:13-CV-02439 JAM-EFB
2:14-CV-01946 JAM-EFB;
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2:14-CV-01963 JAM-EFB;
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2:15-CV-00623 JAM-EFB;
2:15-CV-02150 JAM-EFB;
2:15-CV-02396 JAM-EFB;
1:15-CV-01748 JAM-EFB;
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2:15-CV-02594 JAM-EFB;
2:16-CV-00174 JAM-EFB;
2:16-CV-00211 JAM-EFB;
2:16-CV-01028 JAM-EFB.

**ORDER GRANTING STIPULATION TO
EXTEND DISCOVERY AND RELATED
DEADLINES**

23 Judge: Hon. John A. Mendez
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1 On the stipulation of the parties, and good cause appearing therefor,

2 IT IS ORDERED that the deadlines in the following cases are extended as follows: (1) the close
3 of discovery is extended from July 28, 2017, to September 29, 2017; (2) the dispositive motion deadline
4 is extended from October 10, 2017, to December 8, 2017; and (3) the dispositive motion hearing date is
5 continued from November 7, 2017, to January 9, 2018.

6 This order applies only to the following related cases:

- 7 ■ *Keith Welday v. Rite Aid Corp.*, No. 2:13-CV-02439 JAM-EFB;
- 8 ■ *Tom Bauser v. Rite Aid Corp.*, No. 2:14-CV-01946 JAM-EFB;
- 9 ■ *Mark Jaeger v. Rite Aid Corp.*, No. 2:14-CV-01960 JAM-EFB;
- 10 ■ *Paul Neumann v. Rite Aid Corp.*, No. 2:15-CV-00623 JAM-EFB;
- 11 ■ *James Kilgore et al. v. Rite Aid Corp.*, No. 2:15-CV-02150 JAM-EFB;
- 12 ■ *Mike Campbell v. Rite Aid Corp.*, No. 2:15-CV-02396 JAM-EFB;
- 13 ■ *Bart Hillard et al. v. Rite Aid Corp.*, No. 1:15-CV-01748 JAM-EFB;
- 14 ■ *Robert Hollandsworth v. Aid Corp.*, No. 2:15-CV-02597 JAM-EFB;
- 15 ■ *Destrea Bell et al. v. Rite Aid Corp.*, No. 1:15-CV-01872 JAM-EFB;
- 16 ■ *Bryce Williams v. Rite Aid Corp.*, No. 1:15-CV-01874 JAM-EFB;
- 17 ■ *Ramon Hurtado v. Rite Aid Corp.*, No. 2:15-CV-02594 JAM-EFB;
- 18 ■ *Elaheh Salehi et al. v. Rite Aid Corp.*, No. 2:16-CV-00174 JAM-EFB;
- 19 ■ *Aaron Guzman et al. v. Rite Aid Corp.*, No. 2:16-CV-00211 JAM-EFB; and
- 20 ■ *Caren Winegarner v. Rite Aid Corp.*, No. 2:16-CV-01028 JAM-EFB.

21 Dated: June 14, 2017

22 /s/ John A. Mendez
23 John A. Mendez
24 United States District Judge