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Attorney for Plaintiffs and the Class

8 **UNITED STATES DISTRICT COURT**
 9 **EASTERN DISTRICT OF CALIFORNIA**

12 **ELIZABETH SANCHEZ for herself**
 13 **and on behalf of those similarly**
 14 **situated,**

Plaintiffs,

vs.

16 **WAL MART STORES, INC., DOREL**
 17 **JUVENILE GROUP, INC.; and**
 18 **DOES 1 through 25, inclusive,**

Defendants.

Case No: 2:06-CV-02573-RRB-KJM

STIPULATION AND [PROPOSED]
ORDER TO CONTINUE BRIEFING
ON PLAINTIFF'S MOTION FOR
CLASS CERTIFICATION

20 **IT IS HEREBY STIPULATED BY AND BETWEEN PLAINTIFFS ELIZABETH**
 21 **SANCHEZ AND DEFENDANTS WAL-MART STORES, INC. AND DOREL JUVENILE**
 22 **GROUP, INC., BY AND THROUGH THEIR COUNSEL OF RECORD:**

23 WHEREAS, the parties entered into a previous agreement regarding the briefing
 24 schedule on plaintiffs' motion for class certification;

25 WHEREAS, the parties have made their best efforts to schedule the deposition of
 26 Dorel employees and defense experts;

27 WHEREAS, defendant Dorel Juvenile Group, Inc. has now produced certain
 28 deponents, and expert discovery on class certification discovery will be completed on or

1 about February 20, 2009; and

2 WHEREAS, counsel for the parties have met and conferred and have agreed that the
3 briefing schedule should be continued to finish the depositions of Dorel employees and
4 defense experts and extend the time for filing briefs accordingly;

5 IT IS HEREBY STIPULATED that the remaining class certification and briefing
6 schedule shall be modified as follows:

7 1. March 6, 2009
8 Plaintiff will file her reply brief.

9 The parties will meet and confer regarding the hearing including the need for any live
10 testimony and report to the Court on this issue by March 27, 2009. The motion will be
11 heard at the Court's convenience thereafter.

12 Dated: February 11, 2009

CLAYEO C. ARNOLD
A Professional Law Corporation

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14
15 By: _____
16 KIRK J. WOLDEN
Attorney for the Plaintiffs

17 Dated: February 11, 2009

SCHIFF HARDIN LLP

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19
20 By: _____
21 KATHLEEN A. STIMELING
Attorney for the Defendants

22 IT IS SO ORDERED.

23 Dated: February 12, 2009

/s/ John A. Mendez
UNITED STATES DISTRICT JUDGE