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IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

SPRINKLER FITTERS LOCAL UNION 669, BRAD CONRADO, DEAN JENSEN, and, THOMAS CAUDLE, individually and on behalf of all others similarly situated, Plaintiffs, vs. PRO-TECH FIRE PROTECTION SYSTEMS, CORP. and DOES 1 through 50, inclusive, Defendants.	CASE NO. 2:08-CV-00643-JAM-EFB **JOINT STIPULATION AND ORDER EXTENDING DISCOVERY CUT-OFF** Complaint Filed: April 3, 2008 Trial Date: September 14, 2009

THE PARTIES TO THIS ACTION, THROUGH THEIR RESPECTIVE ATTORNEYS, HEREBY STIPULATE AS FOLLOWS:

1. This class action wage and hour lawsuit was filed on March 21, 2008.

2. In their Joint Status Report, Plaintiffs and Defendants agreed on a schedule for this litigation, anticipating *inter alia* that both sides would have completed sufficient discovery to make a settlement conference meaningful by November 2008, prior to Plaintiffs' anticipated filing of a motion for class certification in December 2008.

3. Based on the parties' Joint Status Report, on June 4, 2008, the Court issued a Status (Pre-trial Scheduling) Order including the following dates:

   a. All dispositive motions are to be filed by March 25, 2009;

   b. All discovery is to be completed by February 27, 2009;

   c. Expert witnesses are to be disclosed by December 12, 2008;

   d. Final Pre-trial Conference is set for May 29, 2009;

   e. Jury trial is set for July 6, 2009.

4. Thereafter, the parties realized that discovery would take much longer than anticipated. They stipulated to extending the dates in the scheduling order by 60 days.

5. On November 12, 2008, Honorable John A. Mendez issued an Order Extending Time for Motions, Discovery, Final Pre-Trial Conference, and Trial, including the following dates:

   a. All dispositive motions are to be filed by May 26, 2009;

   b. Hearing on dispositive motions to be noticed for July 1, 2009 at 9:00 a.m.;

   c. All discovery is to be completed by April 27, 2009;

   d. Expert witnesses are to be disclosed by February 12, 2009;

   e. Final Pre-trial Conference is set for August 7, 2009;

   f. The parties joint pretrial statement shall be filed no later than July 31,

2009; and

g. Jury trial is set for September 14, 2009 at 9:00 a.m.

6. The Plaintiffs have not yet filed a motion for class certification.

7. The parties need yet additional time beyond April 27, 2009 to conduct and complete discovery and resolve disputed discovery issues. This is a complex case involving over 350 prospective class members, and the parties underestimated the amount of time needed to conduct discovery and resolve discovery issues in this case. The parties have been meeting and conferring in good faith on several discovery issues.

8. The parties agree to a continuance of the current discovery cut-off date from April 27, 2009 to May 29, 2009.

9. The parties shall file with the Court a brief joint mid-litigation statement no later than fourteen (14) days prior to May 29, 2009, pursuant to the Status (Pre-trial Scheduling) Order dated June 3, 2008.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: April _3_, 2009

LAW OFFICES OF ELLYN MOSCOWITZ

By: _/s/ Kathy Roberts_____
KATHY ROBERTS/ELLYN MOSCOWITZ
Attorneys for Plaintiffs,
SPRINKLER FITTERS LOCAL UNION 669, BRAD CONRADO, DEAN JENSEN and THOMAS CAUDLE, individually and on behalf of all others similarly situated

Dated: April _3_, 2009

REDIGER, McHUGH & HUBBERT, LLP

By: _/s/ Laura C. McHugh_____
LAURA C. McHUGH
Attorneys for Defendant,
PRO-TECH FIRE PROTECTION SYSTEMS CORP.

PURSUANT TO THIS STIPULATION, IT IS SO ORDERED.

Dated: April 6, 2009

/s/ John A. Mendez
Hon. JOHN A. MENDEZ
United Stated District Judge