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19
20 **UNITED STATES DISTRICT COURT**
21 **EASTERN DISTRICT OF CALIFORNIA**

22 LAC ANH LE, *et al.*,
23
24 Plaintiffs.
25 v.
26 PRICEWATERHOUSECOOPERS LLP,
27 Defendant.

Case No. 2:08-cv-00965 LKK/GGH
**STIPULATION AND ORDER RE
SECOND MOTION FOR
CONDITIONAL CERTIFICATION**

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STIPULATION AND [PROPOSED] ORDER RE SECOND MOTION
FOR CONDITIONAL CERTIFICATION
CASE NO. 2:08-CV-00965-LKK-GGH

1 **STIPULATION**

2 WHEREAS, on April 22, 2009, the Court issued an Order directing Plaintiffs Samuel
3 Brandon Kress, Lac Ahn Le, Jason Patterson, Lauren San Mateo, James Stekelberg, Jeffrey
4 Laberge, Willow Markham, Dana Blindbury, Jesse Kenny, Kelly C. Jones, and Antoine Powell
5 (collectively, Plaintiffs) to file, *inter alia*, their second Fair Labor Standards Act ("FLSA")
6 collective certification motion as to a putative nationwide class of Associates and Senior
7 Associates in Defendant PricewaterhouseCoopers LLP's ("PwC") Advisory and Tax lines of
8 service and Senior Associates in PwC's Assurance line of service by May 14, 2010 ("Second
9 Motion for Conditional Certification");

10 WHEREAS, the parties are negotiating the terms of a potential stipulated consent to
11 conditional certification as to some of the groups of employees at issue in Plaintiffs' Second
12 Motion for Conditional Certification;

13 WHEREAS, the parties need additional time to consider and negotiate the stipulation;

14 WHEREAS, the stipulation being negotiated, if finalized, will impact the scope of
15 Plaintiffs' Second Motion for Conditional Certification;

16 WHEREAS, the parties have met and conferred and agree to extend the deadline for
17 Plaintiffs to file their Second Motion for Conditional Certification by two weeks to May 28,
18 2010;

19 **ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED** by and between
20 Plaintiffs and PwC, by and through their respective undersigned counsel, that:

21 1. Plaintiffs' Second Motion for Conditional Certification may be filed on or before
22 May 28, 2010;

23 2. PwC's opposition brief shall be filed 45 days from the date Plaintiffs file their
24 Second Motion for Conditional Collective Certification, and Plaintiffs' reply brief shall be filed
25 30 days thereafter;

26 3. All other dates set forth in the Court's April 22, 2009 order shall remain in
27 effect.
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IT IS HEREBY STIPULATED.

Dated: May 5, 2010

JULIE A. TOTTEN
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/s/ Julie A. Totten
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Dated: May 5, 2010

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/s/ Peter A. Muhic
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ORDER

PURSUANT TO STIPULATION, **IT IS SO ORDERED.**

Dated: May 6, 2010


LAWRENCE K. KARLTON
SENIOR JUDGE
UNITED STATES DISTRICT COURT