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21 UNITED STATES DISTRICT COURT
22 EASTERN DISTRICT OF CALIFORNIA

23 SAMUEL BRANDON KRESS, et al.,

24 Plaintiffs,

25 v.

26 PRICEWATERHOUSECOOPERS LLP,

27 Defendant.
28

Case No. 08-CV-00965 LKK/GGH

**STIPULATION AND ORDER
EXTENDING TIME FOR
PLAINTIFFS TO FILE
COLLECTIVE CERTIFICATION
MOTION**

STIPULATION

WHEREAS, on December 16, 2008, the Court issued a Status Conference Order directing Plaintiffs Samuel Brandon Kress, Lac Ahn Le, Jason Patterson, Lauren San Mateo, James Stekelberg, Jeffrey Laberge, Willow Markham, Dana Blindbury, Jesse Kenny, Kelly C. Jones, and Antoine Powell (collectively, Plaintiffs) to file their initial Fair Labor Standards Act ("FLSA") collective certification motion as to a putative nationwide class of Associates in Defendant PricewaterhouseCoopers LLP's ("PwC") Assurance line of service on March 20, 2009;

WHEREAS, the parties have propounded discovery relating to Plaintiffs' initial collective certification motion and are presently engaged in the process of responding to such discovery;

WHEREAS, Defendant has requested additional time to respond to Plaintiffs' discovery requests and the parties have met and conferred and agree that additional time is necessary in order for discovery relating to Plaintiffs' initial collective certification motion to be completed;

WHEREAS, the parties have met and conferred and agree that, as a result of the additional time needed to complete certification-related discovery, an extension of the briefing schedule on Plaintiffs' initial collective certification motion is warranted;

WHEREAS, the parties have met and conferred and agree that the date on which Plaintiffs shall file their initial collective certification motion should be extended from March 20, 2009 to April 20, 2009;

WHEREAS, the parties have met and conferred and clarified that Plaintiffs' initial collective certification motion will seek collective certification as to a putative class of Associates in the Attest division of PwC's Assurance line of service in the United States;

WHEREAS, the parties have met and conferred and agree that the time periods for the filing of opposition and reply briefs, and all other dates regarding the prosecution of this action, shall remain the same as set forth in the Court's December 16, 2008 Status Conference Order.

ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs and PwC, by and through their respective undersigned counsel, that this stipulated order be approved and entered by the Court, and that Plaintiffs' initial collective certification motion as to a putative class of Associates in the Attest division of PwC's Assurance line of service in the

1 United States shall be filed on April 20, 2009. The time periods for the filing of opposition and
2 reply briefs, and all other dates regarding the prosecution of this action, shall remain the same as
3 set forth in the Court's December 16, 2008 Status Conference Order.

4 IT IS HEREBY STIPULATED.

5 Dated: January 23, 2009

JULIE A. TOTTEN
NORMAN C. HILE
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ANDREA L. BROWN
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9 /s/ Julie A. Totten

JULIE A. TOTTEN
Attorneys for Defendant
PricewaterhouseCoopers LLC

12 Dated: January 23, 2009

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21 /s/ Gerald D. Wells, III

GERALD D. WELLS, III
Attorneys for Plaintiffs

23 **ORDER**

24 PURSUANT TO STIPULATION, IT IS SO ORDERED.

25 Dated: January 26, 2009

26 
LAWRENCE K. KARLTON
SENIOR JUDGE
UNITED STATES DISTRICT COURT