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Attorneys for Defendant
RBC CAPITAL MARKETS CORPORATION

1 THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF CALIFORNIA
3

4 CARL R. WRIGHT, on behalf of himself,
5 all others similarly situated, the general
6 public, and as an "aggrieved employee"
under the California Labor Code Private
Attorneys General Act

7 Plaintiff,

8 v.

9 RBC CAPITAL MARKETS
10 CORPORATION, a corporation formerly
doing business as RBC DAIN
11 RAUSCHER INC., RBC DAIN
RAUSCHER INC., RBC WEALTH
12 MANAGEMENT; a division of RBC
CAPITAL MARKETS CORPORATION,
and DOES 1 through 50 inclusive,

13 Defendants.
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Case No. 2:09-cv-03601 FCD GGH

**JOINT STIPULATION AND ORDER
EXTENDING TIME FOR DEFENDANT
TO FILE ANSWER TO FIRST AMENDED
COMPLAINT AND PARTIES TO FILE
JOINT PRETRIAL SCHEDULING
CONFERENCE STATEMENT BY 30 DAYS**

1
2 Defendant RBC Capital Markets Corporation (“RBC”) and Plaintiff Carl R. Wright
3 (“Wright”) (collectively, the “Parties”) submit the following Joint Stipulation and Proposed Order
4 extending the time for RBC to file its Answer to Wright’s First Amended Complaint and the time
5 for the Parties to file the Joint Pretrial Scheduling Conference Statement by thirty (30) days while
6 the Parties attempt to reach an agreement settle this action in its entirety.

7 1. Wright filed this putative class and representative action in the Sacramento County
8 Superior Court on November 17, 2009, alleging various violations of the California Labor Code.
9 The action was removed to this Court on December 29, 2009 pursuant to the Class Action
10 Fairness Act of 2005.

11 2. On January 29, 2010, RBC filed its partial motion to dismiss or stay Wright’s First
12 Amended Complaint. RBC’s motion was heard on June 4, 2010. On June 24, 2010, this Court
13 issued its Memorandum and Order (“Order”) staying Wright’s fourth claim for relief and related
14 derivative claims and dismissing Wright’s first claim for relief and derivative claims under the
15 first-to-file rule.

16 3. The Order provided that RBC would answer the remaining allegations in the First
17 Amended Complaint within twenty (20) days of the Order and that the Parties would file a Joint
18 Pretrial Scheduling Conference Statement within thirty (30) days of the Order.

19 4. Based in part on the narrowing of issues and claims following the Court’s Order,
20 the Parties are now engaged in settlement discussions and believe that there is a potential to reach
21 an agreement to resolve this action in its entirety within the next thirty (30) days.

22 5. In order to avoid unnecessary attorneys’ fees and costs associated with the
23 preparation and filing of RBC’s Answer and the Joint Pretrial Scheduling Conference Statement
24 and focus on resolving this action in a timely fashion, the Parties agree that the deadlines to file
25 RBC’s Answer and the Joint Pretrial Scheduling Conference Statement should be extended by
26 thirty (30) days each.

27 6. Accordingly, the Parties agree that the deadline for RBC to file its Answer to
28 Wright’s First Amended Complaint should be extended by thirty (30) days. RBC’s Answer to the
First Amended Complaint will be filed no later than August 13, 2010. The Parties further agree

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2 that the deadline to file the Joint Pretrial Scheduling Conference Statement will be extended by
3 thirty (30) days. The Joint Pretrial Scheduling Conference Statement will be filed no later than
4 August 23, 2010.

5 Dated: July 12, 2010

MORGAN, LEWIS & BOCKIUS LLP

6
7 By s/Steven K. Ganotis

8 Alison B. Willard
9 Steven K. Ganotis
10 Attorneys for Defendants
11 RBC CAPITAL MARKETS
CORPORATION, RBC DAIN
RAUSCHER INC., AND RBC WEALTH
MANAGEMENT

12 Dated: July 12, 2010

LAW OFFICES OF WILLIAM P.
TORNGREN

13
14 By s/William P. Torngren


15 William P. Torngren
16 Attorneys for Wright
CARL R. WRIGHT

17 **ORDER**

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19 The Parties having so stipulated, and GOOD CAUSE APPEARING THEREFORE, it is
20 hereby ordered that the deadline for RBC to file its Answer to Wright's First Amended Complaint
21 should be extended by thirty (30) days. RBC's Answer to the First Amended Complaint will be
22 filed no later than August 13, 2010. The deadline for the Parties to file the Joint Pretrial
23 Scheduling Conference Statement will be extended by thirty (30) days. The Joint Pretrial
24 Scheduling Conference Statement will be filed no later than August 23, 2010.

25 Date: July 12, 2010

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27 
28 FRANK C. DAMRELL, JR.
UNITED STATES DISTRICT JUDGE