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14	UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA				
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17	LUKE HALTON and DENNIS BIER, Individually and on Behalf of All Other) Case No. 2:10-cv-02400-FCD-EFB			
18	Similarly Situated Current and Former Employees,	 JOINT STIPULATION AND ORDER TO MODIFY SCHEDULING ORDER 			
19	Plaintiffs,)			
20	VS.)			
21	VALSPAR CORPORATION AND)			
22	SUBSIDIARIES, a Delaware corporation, and DOES 1 through 10, Inclusive,				
23	Defendants.				
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28		1 ER TO MODIFY SCHEDULING ORDER 0-2400 FCD EFB			

	1	1 The parties to the above-referenced action stipulate as follows:				
	2	WHEREAS, on March 3, 2011, the Court issued its Status (Pretrial Scheduling) Order				
	3	3 (Docket No. 16) setting the following pretrial deadlines:				
	4	1. Pre-certification discovery cut-off: August 15, 2011;				
	5	2. Plaintiff's Motion for Class Certification: December 16, 2011;				
	6	3. Defendant's Opposition: December 30, 2011;				
	7	4. Plaintiff's Reply: January 6, 2012; and				
	8	5. Hearing on Class Certification: January 13, 2012.				
	9	WHEREAS, the parties are engaging in discovery;				
	10	WHEREAS, the parties have not yet finalized a stipulated protective order, in part, because				
802	11	Defendant must ensure that any such order complies with its obligations to third parties;				
wn LLP Street 94111-5802	12	WHEREAS, the parties intend to continue working toward completing discovery and agree				
	13	that additional time is necessary to prepare for class certification;				
Winston & Stri 101 Californis San Francisco, CA	14	WHEREAS, the parties have met and conferred to determine a schedule for briefing and				
Vinsto 101 (France	15	hearing the Plaintiff's Motion for Class Certification that accommodates previously scheduled travel				
V San	16	and unavailability of counsel;				
	17	THE PARTIES THEREFORE STIPULATE AND REQUEST THAT the Court vacate the				
	18	above-referenced deadlines, and set new deadlines as follows:				
	19	1. Pre-certification discovery cut-off: December 16, 2011;				
	20	2. Plaintiff's Motion for Class Certification: January 31, 2012;				
	21	3. Defendant's Opposition: February 14, 2012;				
	22	4. Plaintiff's Reply: February 21, 2012; and				
	23	5. Hearing on Class Certification: March 20, 2012.				
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		2 JOINT STIPULATION AND ORDER TO MODIFY SCHEDULING ORDER				
		CASE NO. 10-2400 FCD EFB				

	1	DATED: July 22, 2011	KHOI	RRAMI POLLARD & ABIR LLP		
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		JOINT STIPULATION AND ORDER TO MODIFY SCHEDULING ORDER CASE NO. 10-2400 FCD EFB				

Winston & Strawn LLP 101 California Street

	1	ORDER				
	2	Having considered the Joint Stipulation submitted by the parties and, GOOD CAUSE				
	3	APPEARING, IT IS HEREBY ORDERED THAT the pre-trial deadlines shall be set as foll				
	4	1. Pre-certification discovery cut-off: December 16, 2011;				
	5	2. Plaintiff's Motion for Class Certification: January 31, 2012;				
	6	3. Defendant's Opposition: February 14, 2012;				
	7	4. Plaintiff's Reply: February 21, 2012; and				
	8	5. Hearing on Class Certification: March 23, 2012.				
	9					
	10					
P 802	11	IT IS SO ORDERED.				
Winston & Strawn LLP 101 California Street San Francisco, CA 94111-5802	12	9/108				
inston & Strawn LJ 101 California Street Francisco, CA 94111-	13	Dated: July 22, 2011				
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		JOINT STIPULATION AND ORDER TO MODIFY SCHEDULING ORDER Case No. 10-2400 FCD EFB				