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12 Attorneys for Defendant
 13 H.J. Heinz Company, L.P., sued erroneously as
 14 "H.J. Heinz Company" and HeinzSeed, an
 unincorporated division of H.J. Heinz Company,
 15 L.P.

16 **UNITED STATES DISTRICT COURT**
 17 **EASTERN DISTRICT OF CALIFORNIA**
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19 TAT TOHUMCULUK A. S., a Turkish company,
 20

21 Plaintiff,

22 vs.

23 H.J. HEINZ COMPANY, a Pennsylvania
 24 corporation registered to do business in
 California, and HEINZSEED, a division of H.J.
 25 HEINZ COMPANY,

26 Defendants.
 27
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Case 2:13-cv-00773-WBS-KJN

**THIRD STIPULATION AND [PROPOSED]
 ORDER TO CONTINUE INITIAL STATUS
 CONFERENCE**

Current Hearing Scheduled:
 Date: November 25, 2013
 Time: 2 p.m.
 Courtroom: 5, 14th Floor

Compl. Filed: April 19, 2013

Honorable William B. Shubb

STIPULATION

1
2 Plaintiffs TAT Tohumculuk A.S. (“Plaintiff”) and Defendants H.J. Heinz Company, L.P.,
3 sued erroneously as “H.J. Heinz Company” and HeinzSeed, an unincorporated division of H.J. Heinz
4 Company, L.P. (“Defendants”) (collectively, the “Parties”) hereby submit, through their undersigned
5 counsel of record, the following Stipulation and Proposed Order:

6 WHEREAS, on April 22, 2013, this Court issued its Order Re: Status (Pretrial Scheduling)
7 Conference, which set the Status Conference in the above action for July 22, 2013 (Doc. No. 5);

8 WHEREAS, on June 27, 2013, pursuant to the stipulation of the Parties, the Court ordered
9 the Status Conference continued to September 30, 2013 (Doc. No. 20);

10 WHEREAS, on July 12, 2013, pursuant to the stipulation of the Parties, the Court ordered the
11 Status Conference continued to November 25, 2013 (Doc. No. 22);

12 WHEREAS, on October 21, 2013, the Court heard oral argument on Defendants’ Motion to
13 Dismiss Plaintiff’s First Amended Complaint (Doc. No. 29), and has not yet ruled on Defendants’
14 Motion;

15 WHEREAS, counsel for Defendants and Plaintiff wish to stipulate to move the Status
16 Conference hearing to a date after the Motion is decided;

17 WHEREAS, counsel for Defendants and Plaintiff believe that good cause exists to continue
18 the status conference in order to preserve the time and resources of the Court and the Parties;

19 THEREFORE, IT IS HEREBY STIPULATED between counsel for Defendants and counsel
20 for Plaintiff that:

- 21 • The Status Conference currently scheduled for November 25, 2013 at 2:00
22 p.m. is continued to a date after the Court rules on Defendants’ Motion to
23 Dismiss Plaintiff’s First Amended Complaint.

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25 **SO STIPULATED.**

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DATED: November 6, 2013

ANASTASSIOU & ASSOCIATES

By _____
Effie F. Anastassiou
Attorneys for Plaintiff
TAT TOHUMCULUK A.S.

DATED: November 6, 2013

REED SMITH LLP


By /s/ Andrew Amoroso
Andrew Amoroso
Attorneys for Defendant
H.J. Heinz Company, L.P., sued erroneously as “H.J.
Heinz Company” and HeinzSeed, an unincorporated
division of H.J. Heinz Company, L.P.

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ORDER

Appearing that good cause exists pursuant to the foregoing stipulation of the Parties, IT IS
HEREBY ORDERED that the Status Conference currently scheduled for November 25, 2013 at 2:00
p.m. is continued to **December 23, 2013 at 2:00 p.m. in Courtroom 5, 14th Floor.** A Joint Status
Report shall be filed no later than **December 9, 2013.**

Dated: November 6, 2013



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE