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Attorneys for Defendant  
H.J. Heinz Company, L.P. and HeinzSeed, an  
unincorporated division of H.J. Heinz Company,  
L.P.

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

TAT TOHUMCULUK A. S., a Turkish company,

Plaintiff,

v.

H.J. HEINZ COMPANY, L.P., a Pennsylvania  
Limited Partnership registered to do business in  
California, and HEINZSEED, an unincorporated  
division of H.J. HEINZ COMPANY, L.P.,

Defendants.

Case 2:13-cv-00773-WBS-KJN

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

Current Hearing Scheduled:

Date: December 23, 2013  
Time: 2 p.m.  
Courtroom: 5, 14th Floor

Compl. Filed: April 19, 2013

Honorable William B. Shubb

**STIPULATION**

Plaintiffs TAT Tohumculuk A.S. (“Plaintiff”) and Defendants H.J. Heinz Company, L.P., and Heinzseed, an unincorporated division of H.J. Heinz Company, L.P. (collectively, “Defendants”) (collectively, the “Parties”) hereby submit, through their undersigned counsel of record, the following Stipulation and Proposed Order:

WHEREAS, on November 14, 2013, this Court entered its Memorandum and Order re Motion to Dismiss (Dkt. 32) granting in part and denying in part Defendants’ motion to dismiss Plaintiff’s First Amended Complaint, and granting Plaintiff until December 4, 2013, to file a Second Amended Complaint;

WHEREAS, Plaintiff intends to file a Second Amended Complaint on or before December 4, 2013;

WHEREAS, since the response to the Second Amended Complaint would be due during the holidays, the Parties hereby agree and stipulate that Defendants’ response to the Second Amended Complaint shall be due no later than January 3, 2014;

WHEREAS, the Status Conference in the above action is currently scheduled for December 23, 2013;

WHEREAS, the Parties agree that good cause exists to continue the Status Conference currently scheduled on December 23, 2013, to a date after Defendants respond to the Second Amended Complaint, and further request such a continuance to avoid a conflict between the currently scheduled Status Conference and scheduled end-of-year holidays for the counsel for both parties; and

WHEREAS, counsel for Plaintiff and Defendants stipulate to move the Status Conference hearing to January 6, 2014, when the parties are both mutually available, or to a date thereafter at the Court’s convenience;

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2 THEREFORE, IT IS HEREBY STIPULATED between counsel for Defendants and counsel  
3 for Plaintiff that:

- 4 • The deadline for Defendants to file a responsive pleading to the Second  
5 Amended Complaint shall be January 3, 2014; and
- 6 • The Status Conference currently scheduled for December 23, 2013 at 2:00  
7 p.m. is continued to January 6, 2014 at 2:00 p.m., or a date thereafter at the  
8 Court's convenience.

9 **SO STIPULATED.**

10  
11 DATED: November 22, 2013

ANASTASSIOU & ASSOCIATES

12  
13 By /s/ Effie F. Anastassiou  
14 Effie F. Anastassiou  
15 Attorneys for Plaintiff  
TAT TOHUMCULUK A.S.

16 DATED: November 22, 2013

REED SMITH LLP


17  
18 By /s/ David S. Reidy  
19 David S. Reidy  
20 Attorneys for Defendant  
21 H.J. Heinz Company, L.P., sued erroneously as "H.J.  
22 Heinz Company" and HeinzSeed, an unincorporated  
23 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 deadline for Defendants to file a responsive pleading to the Second  
Amended Complaint shall be January 3, 2014, and the **Scheduling Conference** currently scheduled  
for December 23, 2013 at 2:00 p.m. **is continued to January 21, 2014 at 2:00 p.m.** A **Joint Status  
Report** shall be filed no later than **January 7, 2014.**

SO ORDERED:

Dated: November 22, 2013

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE