

1 **KERSHAW, COOK & TALLEY PC**  
 2 William A. Kershaw, State Bar No. 057486  
 3 Lyle W. Cook, State Bar No. 148914  
 4 Stuart C. Talley, State Bar No. 180374  
 5 401 Watt Avenue  
 6 Sacramento, California 95864  
 7 Telephone: (916) 779-7000  
 8 Facsimile: (916) 721-2501

9 *Counsel for Plaintiff*

10 **GIBSON, DUNN & CRUTCHER LLP**  
 11 Daniel J. Thomasch (Admitted *Pro Hac Vice*)  
 12 dthomasch@gibsondunn.com  
 13 Lauren J. Elliot (Admitted *Pro Hac Vice*)  
 14 llliot@gibsondunn.com  
 15 200 Park Avenue  
 16 New York, NY 10166  
 17 Telephone: (212) 351-3800  
 18 Facsimile: (212) 351-6200

19 *Counsel for PricewaterhouseCoopers LLP*

20 [Additional Counsel Listed on Signature Page]

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

23 \_\_\_\_\_  
 24 YURY ADAMOV, individually, and on behalf  
 25 of himself and all other similarly situated  
 26 current and former employees of  
 27 PricewaterhouseCoopers LLP,

28 Plaintiffs

v.

29 PRICEWATERHOUSECOOPERS LLP, a  
 30 Limited Liability Partnership; and DOES 1-  
 31 100, inclusive,

32 Defendant.

Case No. 2:13-cv-01222-TLN-AC

**STIPULATION AND ORDER TO  
 EXTEND DISCOVERY AND CLASS  
 CERTIFICATION DEADLINES**

1 Pursuant to Eastern District of California Civil Local Rule 143, Plaintiff Yury Adamov  
2 and Defendant PricewaterhouseCoopers LLP, by their undersigned counsel, hereby stipulate as  
3 follows:

4 WHEREAS, on February 6, 2017, the Court issued a Pretrial Scheduling Order (Dkt. No.  
5 51), setting the following deadlines:

- 6 • Class certification discovery cut off: September 14, 2017
- 7 • Designation of class-related expert witnesses and filing of Federal Rule of  
8 Civil Procedure 26(a)(2)(B) written report(s): November 9, 2017
- 9 • Deadline for filing class certification motion: December 14, 2017

10 WHEREAS, on July 31, 2017, Defendant filed a Motion for Summary Judgment against  
11 Plaintiff Yury Adamov;

12 WHEREAS, Defendant's summary judgment motion is fully briefed and awaiting  
13 disposition by the Court;

14 WHEREAS, the parties have not yet completed class certification discovery, in part due to  
15 the pending potentially dispositive motion;

16 WHEREAS, the parties have not previously sought permission from the Court to extend  
17 the deadlines related to the February 6, 2017 Pretrial Scheduling Order;

18 WHEREAS, the parties desire and agree that good cause exists to extend the scheduled  
19 deadlines to allow additional time for class certification discovery and motion practice and  
20 Plaintiff's class certification motion;

21 NOW THEREFORE, the parties stipulate that the Court may enter an Order as follows:

- 22 1. Phase I class certification discovery shall be completed by December 7, 2017.
- 23 2. All counsel are to designate in writing, file with the Court, and serve upon all other  
24 parties the name, address, and area of expertise of each expert that they propose to tender at class  
25 certification not later than February 2, 2018. The designation shall be accompanied by a written  
26 report prepared and signed by the witness, which shall comply with the Federal Rules of Civil  
27 Procedure 26(a)(2)(B). Within twenty (20) days after the designation of expert witnesses, any  
28

1 party may designate a supplemental list of expert witnesses who will express an opinion on a  
2 subject covered by an expert designated by an adverse party.

3 3. Plaintiff's Motion for Class Certification shall be filed by March 9, 2018.

4 4. The Court's February 6, 2017 Pretrial Scheduling Order shall otherwise remain in  
5 effect.

6 Dated: September 29, 2017

7 Respectfully Submitted,

8  
9 /s/ William A. Kershaw

10 **KERSHAW, COOK & TALLEY PC**

11 William A. Kershaw

12 Lyle W. Cook

13 Stuart C. Talley

14 401 Watt Avenue

15 Sacramento, California 95864

16 Telephone: (916) 779-7000

17 Facsimile: (916) 721-2501

18 *Counsel for Plaintiff*

9 /s/ Julie A. Totten

10 **GIBSON, DUNN & CRUTCHER LLP**

11 Daniel J. Thomasch

12 Lauren J. Elliot

13 200 Park Avenue

14 New York, NY 10166

15 Telephone: (212) 351-3800

16 Facsimile: (212) 351-6200

17 **ORRICK HERRINGTON  
& SUTCLIFFE LLP**

18 Norman C. Hile

19 Julie A. Totten

20 400 Capitol Mall, Suite 3000

21 Sacramento, CA 95814

22 Telephone: (916) 329-4924

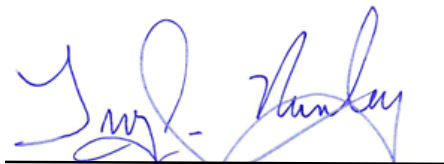
23 Facsimile: (916) 329-4900

24 *Counsel for Defendant*

25 **ORDER**

26 **IT IS SO ORDERED.**

27 Dated: October 3, 2017

28  


Troy L. Nunley

United States District Judge