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20 [Additional Counsel Listed on Signature Page]

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

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

27 Plaintiffs

28 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 and
3 jointly request the Court to extend ONLY the class certification related discovery cutoff date
4 from December 7, 2017 to January 19, 2018 while keeping all other currently scheduled
5 (previously ordered) dates the same, in light of the following events;

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

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

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

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

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

18 WHEREAS, on October 4, 2017 the parties requested and the Court agreed to amend the
19 Pretrial Scheduling Order (Dkt. No. 65) setting the following deadlines:

- 20 • Phase I class certification discovery cut off: December 7, 2017.
- 21 • Designation of class-related expert witnesses and filing of Federal Rule of Civil
22 Procedure 26(a)(2)(B) written report(s): February 2, 2018.
- 23 • Within twenty (20) days after the designation of expert witnesses, any party may
24 designate a supplemental list of expert witnesses who will express an opinion on a
25 subject covered by an expert designated by an adverse party.
- 26 • Deadline for filing class certification motion: March 9, 2018.
- 27 • The Court's February 6, 2017 Pretrial Scheduling Order shall otherwise remain in
28 effect.

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WHEREAS, following extensive meet and confer efforts during the summer and fall of 2017, Plaintiff scheduled a Motion to Compel Production of Documents, which was initially set for hearing on November 8, 2017. However, given the magnitude of the Joint Statement to be provided the Court, Plaintiff agreed to extend the hearing date one week to November 15, 2017. After some communication with the Court, the parties submitted a Stipulation and Proposed Order to that effect. However, on November 1, 2017 the Court entered an Order setting the Motion to Compel Production of Documents Hearing for November 22, 2017;

WHEREAS, it became clear during the week of November 20, 2017 that travel to and from the east coast would be exceedingly difficult on the day before the Thanksgiving Holiday, and PwC requested that the Motion to Compel Hearing be put over until November 29, 2017. Given these travel issues, Plaintiff agreed to accommodate this request. However, due to a conflicting hearing date on November 29, 2017, Plaintiff's counsel suggested the matter be set on December 6, 2017. The parties agreed and submitted a Stipulation and Proposed Order to that effect (Dkt. No. 71);

WHEREAS, in light of the discovery cutoff date for certification related discovery having previously been set for December 7, 2017 by the Honorable Troy Nunley, the Court has declined to hear Plaintiff's Motion To Compel Production of Documents on December 6, 2017 unless Judge Nunley, having previously issued the case scheduling order, agrees to amend that order extending the discovery cutoff date for certification related discovery (Dkt. No. 72);

WHEREAS, the parties therefore request that the Court, while maintaining all previously set scheduling deadlines, extend the class certification related discovery cutoff date from December 7, 2017 to January 19, 2018 to allow the parties to conclude law and motion related matters.

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

- 5 1. Phase I class certification discovery shall be completed by January 19, 2018. All other
- 6 dates currently set forth in this Courts October 4, 2017 Pre-Trial Scheduling Order as
- 7 set forth above, shall remain in full force and effect.

9 Dated: November 21, 2017

10 Respectfully Submitted,

11 */s/ William A. Kershaw*

/s/ Daniel J. Thomasch

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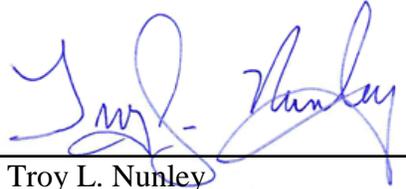
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Counsel for Defendant

ORDER

25 **IT IS SO ORDERED.**

27 Dated: November 27, 2017


Troy L. Nunley
United States District Judge