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**UNITED STATES DISTRICT COURT**

**EASTERN DISTRICT OF CALIFORNIA**

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

Plaintiff

v.

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

Defendant.

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

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

1 Pursuant to Eastern District of California Civil Local Rule (“Local Rule”) 143, Defendant  
2 PricewaterhouseCoopers LLP (“PwC”) and Plaintiff Yury Adamov (“Plaintiff”), by their  
3 undersigned counsel, hereby stipulate and jointly request the Court to extend the class discovery  
4 and class certification deadlines in light of the following events;

5 WHEREAS, Plaintiff served his First Set of Requests for Production of Documents  
6 (“RFPs”) on February 28, 2017;

7 WHEREAS, PwC served its initial responses to Plaintiff’s RFPs on April 28, 2017;

8 WHEREAS, the parties participated in extensive meet and confer efforts to address  
9 disputes related to PwC’s initial responses to Plaintiff’s RFPs;

10 WHEREAS, on July 31, 2017, PwC filed a Motion for Summary Judgment against  
11 Plaintiff, which is fully briefed and pending before the Court;

12 WHEREAS, PwC served supplemental responses to Plaintiff’s RFPs on October 20, 2017  
13 after which the parties engaged in further meet and confer efforts in an attempt to resolve their  
14 discovery disputes;

15 WHEREAS, the parties were unable to resolve their differences and filed an initial Joint  
16 Discovery Statement on November 15, 2017. (Dkt. No. 70.) However, due to scheduling  
17 difficulties around the Thanksgiving holiday, the parties filed a stipulation to continue the  
18 November 22, 2017 hearing date for the initial Joint Discovery Statement to December 6, 2017.  
19 (Dkt. No. 71.)

20 WHEREAS, the November 22, 2017 hearing date was vacated but could not be continued  
21 to the requested December 6, 2017 hearing date in light of the existing December 7, 2017  
22 deadline for completing Phase I discovery. (Dkt. No. 72.) Accordingly, the parties submitted a  
23 Stipulation and [Proposed] Order to Extend Discovery and Class Certification Deadlines (Dkt.  
24 No. 73) after which the cut off for Phase I discovery was extended to January 19, 2018 (Dkt. No.  
25 74).

26 WHEREAS, the parties filed a renewed Joint Discovery Statement on December 13, 2017  
27 addressing twenty document requests—RFP Nos. 1, 3-9, 17, 27, 32, 36, 37, 50-51, 55, 57, 58 and  
28 74 (Dkt. No. 76);

1 WHEREAS, the parties' discovery dispute was heard on December 20, 2017;

2 WHEREAS, Magistrate Judge Claire issued an Order on December 22, 2017, granting  
3 Plaintiff's discovery motion as to RFP Nos. 1, 3-9, 17, 32 and 37 and denying the motion as to  
4 RFP Nos. 27, 36, 50-51, 55, 57, 58, 62 and 74 (Dkt. No. 80);

5 WHEREAS, the parties stipulated to extend the deadline for PwC to seek reconsideration  
6 as to some but not all portions of the December 22, 2017 Order compelling further production of  
7 documents. (Dkt. No. 81.) The Court entered an order on January 4, 2018 extending deadlines  
8 related to PwC's request for reconsideration as well as for Phase I discovery and Plaintiff's  
9 motion for class certification. (Dkt. No. 82);

10 WHEREAS, PwC filed its Request for Reconsideration of Magistrate Judge Claire's  
11 Order as to RFP Nos. 3-9 and 17 on January 19, 2018 (Dkt. No. 87) and Plaintiff filed his  
12 Opposition to PwC's Request for Reconsideration on February 2, 2018 (Dkt. No. 88). PwC's  
13 Request for Reconsideration is fully briefed and pending before the Court;

14 WHEREAS, pursuant to Magistrate Judge Claire's ruling related to Plaintiff's RFP No. 1,  
15 which seeks putative class member contact information and was not the subject of PwC's request  
16 for reconsideration, the parties have met and conferred and agreed upon *Belaire-West* notice and  
17 opt-out procedures. The parties have also retained a notice administrator. *Belaire-West* notice  
18 was disseminated on February 13, 2018 and the opt-out period concludes on March 15, 2018;

19 WHEREAS, PwC served its First Set of Requests for Production of Documents to  
20 Plaintiff ("PwC's RFPs") on October 25, 2017 and Plaintiff served its written responses and  
21 objections to PwC's RFPs on December 20, 2017;

22 WHEREAS, the parties are currently meeting and conferring on Plaintiff's responses to  
23 PwC's RFPs;

24 WHEREAS, in light of the current March 5, 2018 Phase I discovery deadline, documents  
25 and information that have not yet been exchanged pursuant to Judge Claire's December 22, 2017  
26 Order and the ongoing *Belaire-West* notice program, PwC's pending Request for  
27 Reconsideration, upcoming depositions, and other outstanding discovery matters that the parties  
28

1 are continuing to discuss and attempt to resolve, the parties believe a further extension of the class  
2 discovery and class certification deadlines is necessary and warranted;

3 WHEREAS, the parties previously sought permission from the Court to extend deadlines  
4 related to the Pretrial Scheduling Order on October 4, 2017 (Dkt. No. 63), as to only the class  
5 certification discovery cut-off on November 21, 2017 (Dkt. No. 73), and as to the Request for  
6 Reconsideration and class deadlines on January 3, 2018. The three previously requested  
7 extensions were granted (Dkt. Nos. 65, 74 and 82); and

8 WHEREAS, the parties desire and agree that good cause exists to extend the deadlines to  
9 complete class certification discovery and for Plaintiff to file his motion for class certification.

10 NOW THEREFORE, the parties jointly stipulate and request that the Court enter an Order  
11 as follows:

- 12 1. The deadline for class certification discovery is extended to June 1, 2018.
- 13 2. The deadline for class-related expert witness designation is extended to June 15, 2018.
- 14 3. The deadline to file a motion for class certification is extended to July 13, 2018.

15  
16 Dated: February 23, 2018

17 Respectfully Submitted,

18 /s/ William A. Kershaw

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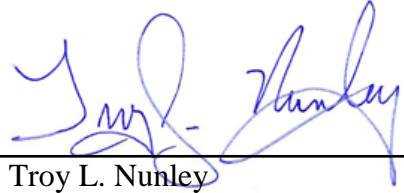
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*Counsel for Defendant*

**ORDER**

**IT IS SO ORDERED.**

Dated: February 28, 2018



Troy L. Nunley  
United States District Judge