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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 Plaintiff

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 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 circumstances:

5 WHEREAS, on July 31, 2017, PwC filed a Motion for Summary Judgment against
6 Plaintiff, which is fully briefed and pending before the Court (Dkt. Nos. 58, 60 and 61);

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

10 WHEREAS, on January 19, 2018, PwC filed its Request for Reconsideration of
11 Magistrate Judge Claire’s Discovery Order as to RFP Nos. 3-9 and 17 (Dkt. Nos. 87 and 88),
12 which is fully briefed and pending before the Court;

13 WHEREAS, the Court’s rulings on the pending motions will impact the scope of the
14 parties’ further class discovery efforts, the contours of Plaintiff’s motion for class certification, as
15 well as Plaintiff’s underlying claims and PwC’s defenses;

16 WHEREAS, Mr. Kershaw (lead counsel for Plaintiff and the putative class in this case)
17 and other members of his firm will be commencing a five-week jury trial in another matter in San
18 Francisco County Superior Court on June 11, 2018;

19 WHEREAS, the parties have met and conferred and agree that based on the pending
20 motions as well as Mr. Kershaw’s upcoming trial, significant economies will be achieved and
21 resources will be conserved for the Court and the parties by extending the class discovery, class-
22 related expert designation, and class certification motion deadlines until after the Court decides
23 PwC’s Motion for Summary Judgment;

24 WHEREAS, the parties previously sought permission from the Court to extend discovery
25 and class certification deadlines (Dkt. Nos. 63, 73 and 89) as well as for the deadline on PwC’s
26 Request for Reconsideration (Dkt. No. 81). The previously requested extensions were granted
27 (Dkt. Nos. 65, 74, 82 and 90); and
28

1 NOW THEREFORE, the parties stipulate and agree that there is good cause for the Court
2 to enter an Order as follows:

- 3 1. The deadline for class certification discovery is extended until 90 days after the
4 Court's decision on the later-decided of PwC's Motion for Summary Judgment and
5 PwC's Motion for Reconsideration;
- 6 2. The deadline for class-related expert witness designation is extended until 14 days
7 after the class certification discovery cutoff; and
- 8 3. The deadline to file a motion for class certification is extended to 28 days after the
9 deadline for class-related expert witness designation.

10 Dated: May 3, 2018

11 Respectfully Submitted,

12 /s/ William A. Kershaw
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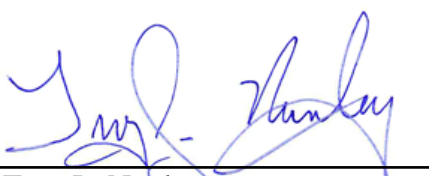
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28 *Counsel for Defendant*

24 **ORDER**

25 **IT IS SO ORDERED.**

26 Dated: May 7, 2018

27 
28 Troy L. Nunley
United States District Judge