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15 CAMBELL SOUP SUPPLY COMPANY, L.L.C.

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

18
19 DANNY McCRARY, on behalf of himself
20 and all others similarly situated, and on
behalf of the general public,

21 Plaintiffs,

22 v.

23 CAMPBELL SOUP SUPPLY COMPANY
24 L.L.C., a Delaware limited liability
company, and DOES 1 through 10,
25 inclusive,

26 Defendants.

Case No.: 2:13-cv-01332-GEB-KJN

**JOINT STIPULATION AND [PROPOSED]
ORDER CONTINUING DEADLINE TO
FILE MOTION FOR CLASS
CERTIFICATION**

RECITALS

A. WHEREAS, Plaintiff filed his Original Complaint in San Joaquin County Superior Court on June 3, 2013;

B. WHEREAS, Plaintiff filed his First Amended Complaint in San Joaquin County Superior Court on June 27, 2013;

C. WHEREAS, on or about July 3, 2013, Defendant removed the action to this Court;

D. WHEREAS, Defendant answered the First Amended Complaint on July 23, 2013;

E. WHEREAS, following the parties' filing of their Joint Status Report on October 11, 2013, the Court issued its Status (Pretrial Scheduling) Order which, among other things, set a deadline of May 1, 2014 for which Plaintiff is to file his motion for class certification;

F. WHEREAS, over the past several months, the parties have met and conferred on numerous issues including, but not limited to, informal discovery and potential resolution. As a result of this meet and confer, the parties have agreed to participate in private mediation with noted class action mediator Lisa Klerman, Esq. on May 6, 2014 in San Francisco, California. Based on this agreement to mediate, the parties believe it is within the best interest of the Court, the parties and their counsel to continue the class certification filing deadline by 100 days to allow the parties to utilize their time and resources toward a potential class-wide resolution of the matter, rather than law and motion.

BASED UPON THE FOREGOING, IT IS HEREBY STIPULATED as follows:

1. Plaintiff's deadline to file his motion for class certification is continued from May 1, 2014 to August 9, 2014.

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