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10 Attorneys for Defendant
UNILEVER UNITED STATES, INC.

11
12 **UNITED STATES DISTRICT COURT**
13 **EASTERN DISTRICT OF CALIFORNIA**

14 ALBA MORALES and LAINIE COHEN on behalf)
of themselves and others similarly situated,)

15 Plaintiffs,)

16 vs.)

17 UNILEVER UNITED STATES, INC.,)

18 Defendant.)
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CASE NO. 2:13-CV-02213-WBS-EFB

**STIPULATION AND (PROPOSED)
ORDER EXTENDING DEFENDANT'S
TIME TO ANSWER AND EXCHANGE
INITIAL DISCLOSURES**

Complaint Filed: October 10, 2013
Judge: Hon. William B. Shubb

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WHEREAS the First Amended Complaint in this matter was filed December 2, 2013;

WHEREAS on April 9, 2014 the parties received notice of the Court’s April 9, 2014 Order granting in part and denying in part Defendant’s motion to dismiss the First Amended Complaint (the “Order”);

WHEREAS the Order gives Plaintiffs until April 29, 2014 to file a Second Amended Complaint should Plaintiffs choose to do so;

WHEREAS Defendant’s answer to the First Amended Complaint would otherwise be due on or before April 23, 2014;

WHEREAS the parties participated in a Rule 26(f) conference on April 15, 2014;

WHEREAS the parties’ initial disclosures would otherwise be due on or before April 29, 2014;

The parties hereby stipulate that they will exchange initial disclosures on or before May 13, 2014.

The parties hereby stipulate that Defendant will answer the First Amended Complaint on or before May 29, 2014.

The parties hereby stipulate that Defendant will answer, move, or otherwise plead in response to the Second Amended Complaint, should Plaintiffs decide to file one, on or before May 29, 2014.

SO STIPULATED.

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19 UNILEVER UNITED STATES, INC.

By: /s/ Mark P. Kindall (as authorized on April
XX, 2014)

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Attorneys for Plaintiffs

20 **IT IS SO ORDERED.**

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22 Dated: April 21, 2014

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24 WILLIAM B. SHUBB
25 UNITED STATES DISTRICT JUDGE
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1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies that all counsel of record who have consented to electronic
3 service are being served with a copy of the attached **STIPULATION AND (PROPOSED) ORDER**
4 **EXTENDING DEFENDANT’S TIME TO ANSWER AND EXCHANGE INITIAL**
5 **DISCLOSURES** via the CM/ECF system on April 21, 2014.

6 DATED: April 21, 2014

7 /s/ James Maxwell Cooper
8 James Maxwell Cooper

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