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

19 ALBA MORALES; LAINIE COHEN; LINDA )  
 CLAYMAN; and KENNETH DREW, on behalf of )  
 20 themselves and others similarly situated, )

21 Plaintiffs, )

22 vs. )

23 CONOPCO INC., d/b/a UNILEVER, )

24 Defendant. )  
 25 )

CIV NO. 2:13-cv-2213 WBS EFB  
 STIPULATION AND [PROPOSED]  
 FIRST MODIFIED SCHEDULING  
 ORDER

26 The parties in the above-captioned matter, by and through their designated counsel,  
 27 **HEREBY AGREE AND STIPULATE** as follows:  
 28

1 WHEREAS, the parties to this case seek to modify the scheduling order [Dkt. #34] (the  
2 “Order”) to permit additional time for discovery in such a way that will not alter the trial date or the  
3 final pre-trial conference;

4 WHEREAS, Plaintiffs served Defendant with an initial set of interrogatories and requests for  
5 production on April 17, 2014;

6 WHEREAS, Defendant responded to Plaintiffs’ initial set of interrogatories and requests for  
7 production on June 3, 2014;

8 WHEREAS, Defendant served Plaintiffs with initial sets of interrogatories and requests for  
9 production on August 6, 2014;

10 WHEREAS, all Plaintiffs responded to Defendant’s initial set of interrogatories and requests  
11 for production by November 14, 2014;

12 WHEREAS, Defendant intends to make an initial production of documents imminently and  
13 will continue producing documents on a rolling basis until complete;

14 WHEREAS, the parties are continuing to meet and confer on discovery-related issues;

15 WHEREAS, the parties have met and conferred, and have agreed, that additional time for  
16 discovery is necessary;

17 WHEREAS, based on the foregoing, the parties wish to modify the schedule set forth in the  
18 Order as follows:

<b>Event</b>	<b>Current Deadlines</b>	<b>Proposed Amended Deadlines</b>
Complete Discovery	February 13, 2015	May 15, 2015
Plaintiffs Disclose Expert(s) / Produce Report(s)	March 13, 2015	June 12, 2015
Defendant Discloses Expert(s) / Produces Report(s) / Defendant Depos Plaintiffs’ Expert(s)	April 10, 2015	July 10, 2015
Plaintiffs Depose Defendant’s Expert(s) / Plaintiffs Disclose Rebuttal Expert(s) and/or Rebuttal Expert Report(s)	May 8, 2015	Aug. 7, 2015
Defendant’s Depose Plaintiffs’ Rebuttal Expert(s)	June 5, 2015	Aug. 28, 2015
Expert Discovery Closes	June 12, 2015	Sept. 4, 2015

1	Plaintiffs' Motion for Class Certification	July 10, 2015	Sept. 11, 2015
2	Defendant's Opposition to Plaintiffs' Motion for Class Certification	August 21, 2015	Oct. 9, 2015
3			
4	Plaintiffs' Reply in Further Support of Their Motion for Class Certification	Sept. 18, 2015	Nov. 6, 2015
5			
6	Oral Argument on Plaintiffs' Motion for Class Certification	Oct. 5, 2015	Nov. 23, 2015
7			
8	All Other Motions (Including Summary Judgment)	Dec. 7, 2015	Dec. 9, 2015
9	Opposition to Summary Judgment Motions		Jan. 15, 2016
10	Reply to Summary Judgment Oppositions		Feb. 5, 2016
11	Oral Argument on Motion(s) for Summary Judgment		Feb. 16, 2016
12	Final Pretrial Conference	Feb. 16, 2016	Feb. 16, 2016
13	Trial	April 12, 2016	April 12, 2016

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15 THE PARTIES HEREBY AGREE AND STIPULATE to, and submit that, good cause is  
16 shown to support the following First Modified Scheduling Order.

17 Accordingly, the Court HEREBY ORDERS that:

18 1. The parties' stipulation to modify the Pretrial Scheduling Order is GRANTED; and the Order  
19 is modified as follows:

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- 21 (i) On or before May 15, 2015, the parties shall complete fact discovery;
  - 22 (ii) On or before June 12, 2015, Plaintiffs shall disclose expert(s) and produce expert(s) report(s);
  - 23 (iii) On or before July 10, 2015, Defendant shall disclose expert(s), produce expert(s) report(s), and depose Plaintiffs' expert(s);
  - 24 (iv) On or before August 7, 2015, Plaintiffs shall depose Defendant's expert(s), Plaintiffs shall disclose rebuttal expert(s) and rebuttal expert(s) report(s);
  - 25 (v) On or before August 28, 2015, Defendant shall depose Plaintiffs' rebuttal expert(s);
  - 26 (vi) On or before September 4, 2015, expert discovery shall close (with all motions to compel heard and resulting orders obeyed on or before September 4, 2015);
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- (vii) On or before September 11, 2015, Plaintiffs shall file their motion for class certification;
- (viii) On or before October 9, 2015, Defendant shall file its opposition to Plaintiff's motion for class certification;
- (ix) On or before November 6, 2015, Plaintiffs shall file their reply brief in further support of their motion for class certification;
- (x) On November 23, 2015, or on a date and time to which the Court is amenable, the Court shall hear oral argument on Plaintiffs' motion for class certification;
- (xi) On or before December 9, 2015, all other motions, including summary judgment, shall be filed;
- (xii) On or before January 15, 2016, oppositions to summary judgment motions shall be filed;
- (xiii) On or before February 5, 2016, reply briefs in support of summary judgment motions shall be filed;
- (xiv) On February 22, 2016, the Court shall hear oral argument on any motions for summary judgment.**
- (xv) The Final Pretrial Conference is continued to March 14, 2016.**

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By:/s/ Mark P. Kindall (as authorized on  
December 31, 2014)

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Attorneys for Plaintiffs

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19 **As modified above, IT IS SO ORDERED.**

20 DATED: January 5, 2015.

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22 EDMUND F. BRENNAN  
UNITED STATES MAGISTRATE JUDGE  
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