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15	Attorneys for Defendant Rite Aid Corporation		
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17	UNITED STATES DISTRICT COURT		
18	EASTERN DISTRICT OF CALIFORNIA		
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20	BRUCE KAUFMAN, an individual	No. 2:14-CV-02	1961 JAM-EFB
21		Related to Nos. 2:13-CV-02439	LAM EED.
22	Plaintiff,	2:14-CV-01946	5 JAM-EFB;
23	vs.	2:14-CV-01957 2:14-CV-01960) JAM-EFB;
24	RITE AID CORPORATION, and DOES 1	2:14-CV-01963 2:14-CV-01965	5 JAM-EFB;
25	through 50, inclusive,	2:15-CV-00429	JAM-EFB.
26	Defendants		FIPULATION TO CONTINUE STAY HEARING AND EADLINES
27		Judge:	Hon. John A. Mendez
28]	
		OTTO I	

Plaintiff Bruce Kaufman and defendant Rite Aid Corporation ("Rite Aid"), acting through their respective counsel of record, hereby stipulate as follows:

- 1. On March 4, 2015, Rite Aid moved to stay this action pending Romero v. Rite Aid Corp., U.S.D.C., C.D. Cal., No. CV 13-7720-MWF (JEMx) ("Romero"), a putative class action in which the plaintiff alleges that Rite Aid misclassified salaried Store Managers as exempt from the overtime pay and related requirements of California law. Rite Aid contends that, because the plaintiff and the putative class in *Romero* are represented by the same counsel who represent plaintiff in this action and plaintiff is a putative class member in *Romero*, the Court here should stay these proceedings as an effective case management tool under its inherent discretionary authority. See Landis v. North American Co., 299 U.S. 248, 254-55 (1936). (See ECF 12.)
- The parties are discussing the scope of the putative class claims in *Romero*, which may impact Rite Aid's motion to stay in this action. As such, the parties wish to avoid the cost and expense of litigating the motion to stay pending developments in *Romero*.
- 3. Accordingly, the parties respectfully request that the Court: (1) continue the hearing on Rite Aid's motion to stay this action and the six related actions from April 8, 2015, to April 22, 2015, or to the first date available for the Court; and (2) reset the deadlines for plaintiff's opposition to and Rite Aid's reply in support of the motion to stay to 14 and seven days, respectively, before the continued hearing on Rite Aid's motion to stay.
- By entering into this stipulation, the parties waive no position that they have taken or could have taken with respect to Rite Aid's motion to stay.

Dated: March 27, 2015. RIGHETTI GLUGOSKI LLP

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By: /s/ Michael Righetti

Michael Righetti Attorneys for Plaintiff Bruce Kaufman

Dated: March 27, 2015. PAUL HASTINGS LLP

By: /s/ Peter A. Cooper

Peter A. Cooper Attorneys for Defendant Rite Aid Corporation

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Attorneys for Plaintiff Bruce Kaufman	1 2 3 4 5 6	MATTHEW RIGHETTI (Cal. State Bar No. 1210 JOHN GLUGOSKI (Cal. State Bar No. 191551) MICHAEL RIGHETTI (Cal. State Bar No. 25854 RIGHETTI GLUGOSKI, P.C. 456 Montgomery Street, Suite 1400 San Francisco, California 94104 Telephone: (415) 983-0900 Facsimile: (415) 397-9005 matt@righettilaw.com john@righettilaw.com mike@righettilaw.com	,	
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PAUL HASTINGS LLP 55 Second Street, 24th Floor San Francisco, California 94105-3441 Telephone: (415) 856-7000 Facsimile: (415) 856-7100 Facsimile: (9	RISHI N. SHARMA (Cal. State Bar No. 239034)		
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Facsimile: (415) 856-7100 jeffwohl@paulhastings.com petercooper@paulhastings.com Attorneys for Defendant Rite Aid Corporation UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA BRUCE KAUFMAN, an individual Plaintiff, Plaintiff, Vs. RITE AID CORPORATION, and DOES 1 through 50, inclusive, Defendants Page 121 Population of the property of the property of the property of the period of the peri	11	San Francisco, California 94105-3441		
rishisharma@paulhastings.com petercooper@paulhastings.com Attorneys for Defendant Rite Aid Corporation UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA BRUCE KAUFMAN, an individual No. 2:14-CV-01961 JAM-EFB Related to Nos. 2:13-CV-02439 JAM-EFB: 2:14-CV-01946 JAM-EFB: 2:14-CV-01946 JAM-EFB; 2:14-CV-01957 JAM-EFB; 2:14-CV-01960 JAM-EFB; 2:14-CV-01965 JAM-EFB; 2:14-CV-01965 JAM-EFB; 2:14-CV-01965 JAM-EFB; 2:14-CV-01965 JAM-EFB; 2:14-CV-01965 JAM-EFB; 2:14-CV-01965 JAM-EFB; 2:15-CV-00429 JAM-EFB; 2:15-CV-00429 JAM-EFB. Defendants Defendants Judge: Hon. John A. Mendez	12	Facsimile: (415) 856-7100		
Attorneys for Defendant Rite Aid Corporation UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA BRUCE KAUFMAN, an individual Plaintiff, Plaintiff, Vs. RITE AID CORPORATION, and DOES 1 through 50, inclusive, Defendants Attorneys for Defendant Rite Aid Corporation UNITED STATES DISTRICT COURT Related to Nos. 2:14-CV-01961 JAM-EFB: 2:14-CV-01946 JAM-EFB: 2:14-CV-01960 JAM-EFB: 2:14-CV-01963 JAM-EFB: 2:14-CV-01963 JAM-EFB: 2:14-CV-01965 JAM-EFB: 2:15-CV-00429 JAM-EFB: 2:15-CV-00429 JAM-EFB. ORDER CONTINUING MOTION TO STAY HEARING AND BRIEFING DEADLINES Judge: Hon. John A. Mendez	13	rishisharma@paulhastings.com		
15 Rite Aid Corporation 16 UNITED STATES DISTRICT COURT 18 EASTERN DISTRICT OF CALIFORNIA 19 BRUCE KAUFMAN, an individual No. 2:14-CV-01961 JAM-EFB 21 Plaintiff, Related to Nos. 2:13-CV-02439 JAM-EFB: 21-4-CV-01946 JAM-EFB; 2:14-CV-01960 JAM-EFB; 2:14-CV-01960 JAM-EFB; 22-14-CV-01960 JAM-EFB; 2:14-CV-01965 JAM-EFB; 2:14-CV-01965 JAM-EFB; 25 Defendants ORDER CONTINUING MOTION TO STAY HEARING AND BRIEFING DEADLINES 27 Judge: Hon. John A. Mendez	14			
17 UNITED STATES DISTRICT COURT 18 EASTERN DISTRICT OF CALIFORNIA 19 No. 2:14-CV-01961 JAM-EFB 20 BRUCE KAUFMAN, an individual No. 2:14-CV-01961 JAM-EFB 21 Related to Nos. 2:13-CV-02439 JAM-EFB: 2:14-CV-01946 JAM-EFB: 2:14-CV-01957 JAM-EFB; 2:14-CV-01963 JAM-EFB; 2:14-CV-01963 JAM-EFB; 2:14-CV-01965 JAM-EFB; 2:14-CV-01965 JAM-EFB; 2:15-CV-00429 JAM-EFB. 25 ORDER CONTINUING MOTION TO STAY HEARING AND BRIEFING DEADLINES 26 Defendants Judge: Hon. John A. Mendez	15			
18 EASTERN DISTRICT OF CALIFORNIA 19 No. 2:14-CV-01961 JAM-EFB 20 BRUCE KAUFMAN, an individual No. 2:14-CV-01961 JAM-EFB 21 Related to Nos. 2:13-CV-02439 JAM-EFB: 2:14-CV-01946 JAM-EFB: 2:14-CV-01965 JAM-EFB; 2:14-CV-01960 JAM-EFB; 2:14-CV-01963 JAM-EFB; 2:14-CV-01965 JAM-EFB; 2:15-CV-00429 JAM-EFB. ORDER CONTINUING MOTION TO STAY HEARING AND BRIEFING DEADLINES 27 Judge: Hon. John A. Mendez	16			
19 20 BRUCE KAUFMAN, an individual Plaintiff, Plaintiff, vs. RITE AID CORPORATION, and DOES 1 through 50, inclusive, Defendants Plaintiff, Plaintiff, Related to Nos. 2:13-CV-02439 JAM-EFB: 2:14-CV-01946 JAM-EFB; 2:14-CV-01957 JAM-EFB; 2:14-CV-01960 JAM-EFB; 2:14-CV-01963 JAM-EFB; 2:14-CV-01965 JAM-EFB; 2:15-CV-00429 JAM-EFB. ORDER CONTINUING MOTION TO STAY HEARING AND BRIEFING DEADLINES Judge: Hon. John A. Mendez	17	UNITED STATES DISTRICT COURT		
Defendants No. 2:14-CV-01961 JAM-EFB	18	EASTERN DISTRICT OF CALIFORNIA		
21 Plaintiff, 22 Plaintiff, 23 vs. 24 RITE AID CORPORATION, and DOES 1 through 50, inclusive, 25 Defendants 26 Defendants Related to Nos. 2:13-CV-02439 JAM-EFB: 2:14-CV-01946 JAM-EFB; 2:14-CV-01957 JAM-EFB; 2:14-CV-01960 JAM-EFB; 2:14-CV-01963 JAM-EFB; 2:14-CV-01965 JAM-EFB; 2:15-CV-00429 JAM-EFB. ORDER CONTINUING MOTION TO STAY HEARING AND BRIEFING DEADLINES Judge: Hon. John A. Mendez	19			
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23 vs. 24 RITE AID CORPORATION, and DOES 1 through 50, inclusive, Defendants 25 Defendants 2 14-CV-01960 JAM-EFB; 2:14-CV-01963 JAM-EFB; 2:14-CV-01965 JAM-EFB; 2:15-CV-00429 JAM-EFB. ORDER CONTINUING MOTION TO STAY HEARING AND BRIEFING DEADLINES Judge: Hon. John A. Mendez	22	Plaintiff,	2:14-CV-01946 JAM-EFB;	
24 RITE AID CORPORATION, and DOES 1 through 50, inclusive, 25 Defendants 2:14-CV-01965 JAM-EFB; 2:15-CV-00429 JAM-EFB. ORDER CONTINUING MOTION TO STAY HEARING AND BRIEFING DEADLINES Judge: Hon. John A. Mendez	23	VS.	2:14-CV-01960 JAM-EFB;	
25 Defendants ORDER CONTINUING MOTION TO STAY HEARING AND BRIEFING DEADLINES Judge: Hon. John A. Mendez	24	through 50, inclusive,	2:14-CV-01965 JAM-EFB;	
26 HEARING AND BRIEFING DEADLINES 27 Judge: Hon. John A. Mendez	25			
	26	Defendants		
28	27		Judge: Hon. John A. Mendez	
	28			