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*Attorneys for Defendant
 Walmart Inc.*

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SHARIDAN STILES, an individual, STILES 4
 U, INC., a California corporation,

Plaintiffs,

v.

WALMART INC., and AMERICAN
 INTERNATIONAL INDUSTRIES,

Defendants.

Case No. 2:14-cv-02234-MCE-DMC

**STIPULATION AND ORDER TO
 SHORTEN TIME FOR HEARING
 ON PLAINTIFFS' MOTION TO
 COMPEL RULE 30(b)(6)
 TESTIMONY OF DEFENDANT
 WALMART INC.**

Plaintiffs Sharidan Stiles and Stiles 4 U, Inc. (“Plaintiffs”) and defendant Walmart Inc. (“Walmart”) (together, the “parties”), by and through their respective counsel, hereby stipulate as follows:

WHEREAS, on January 15, 2020, Plaintiffs served their First Amended Notice of 30(b)(6) Deposition of Defendant Walmart Inc. (“Notice”);

WHEREAS, on January 28, 2020, Walmart served its Responses and Objections to the Notice;

WHEREAS, Walmart has refused to provide a witness to testify on Topic Nos. 4, 5, 6, 7, and 29 (“Deposition Topics”) in the Notice;

WHEREAS, the parties dispute whether Walmart should be required to produce a 30(b)(6) deponent capable of testifying on the Deposition Topics;

WHEREAS, Walmart’s 30(b)(6) deposition is scheduled to take place on February 13, 2020;

WHEREAS, the deadline to complete all fact depositions in this case is February 15, 2020;

WHEREAS, Plaintiffs have filed today a Motion to Compel Rule 30(b)(6) Testimony of Defendant Walmart Inc. and Walmart has filed today a Motion for Protective Order to Limit 30(b)(6) Testimony of Walmart, Inc. (the “Motions”);

WHEREAS, given the overlapping issues in the Motions the parties have agreed to submit a single joint statement, and Plaintiffs agreed to serve Walmart with their portion of the joint statement by January 30, 2020, and allowing for additional edits until February 1, 2020, and Walmart agreed to serve Plaintiffs with its portion of the joint statement by February 3, 2020, for filing on February 3, 2020; and

WHEREAS, the parties respectfully submit that advancing the hearing on the Motion to February 5, 2020, best serves the interests of the Court and the parties because it will allow the Court to resolve the Motions prior to the noticed deposition date for Walmart’s 30(b)(6) deponent.

**THEREFORE, THE PARTIES, BY AND THROUGH THEIR RESPECTIVE
UNDERSIGNED COUNSEL, HEREBY STIPULATE, AND THE COURT ORDERS
AS FOLLOWS:**

The parties shall file their joint statement re: discovery disagreement re: the Motions on February 3, 2020; and

The time for hearing the Motion is shortened to February 5, 2020. The Court will hear argument on the Motion on February 5, 2020.

Respectfully submitted,

Dated: January 30, 2020

**PIERCE BAINBRIDGE BECK PRICE
& HECHT LLP**

/s/ Brian J. Dunne
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Stiles 4 U, Inc.*

Dated: January 30, 2020

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(as authorized on January 30, 2020)
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Attorneys for Defendant Walmart Inc.

PURSUANT TO STIPULATION OF THE PARTIES, IT IS SO ORDERED AS FOLLOWS:

- 1. The parties' stipulated request for an order shortening time is granted;**
- 2. Plaintiffs' motion to compel Rule 30(b)(6) testimony (ECF No. 334) and Walmart's motion for a protective order (ECF No. 336) are set for hearing before the undersigned in Redding, California, on February 5, 2020, at 10:00 a.m.;**
- 3. Personal appearances of counsel are required;**
- 4. The parties shall file a SINGLE Joint Statement regarding these motions on or before 5:00 p.m. on February 3, 2020;**
- 5. Upon the filing of the Joint Statement, the court will determine whether the matter is appropriate for submission without oral argument.**

Dated: January 31, 2020



DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE