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12 *ADDITIONAL COUNSEL OF RECORD LISTED ON*
 13 *NEXT PAGE*

14 UNITED STATES DISTRICT COURT
 15 EASTERN DISTRICT OF CALIFORNIA

17 TERRY T. SNIPES, SR., an individual,
 18 Plaintiff,

19 v.

20 DOLLAR TREE DISTRIBUTION, INC., a
 21 Virginia corporation, and DOES 1 through
 50, Inclusive,
 22 Defendant.

Case No. 2:15-cv-00878-MCE-KJN (TEMP)

**STIPULATION AND ORDER TO EXTEND
 CERTIFICATION AND RELATED
 DISCOVERY DEADLINES**

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Attorneys for Defendant
DOLLAR TREE DISTRIBUTION, INC.

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2 On February 5, 2016, the Court issued a scheduling order setting deadlines for the close of
3 Phase I discovery, and the filing of a motion for class certification. (See Dkt. No. 34.) Since that
4 time, Plaintiff has agreed to dismiss his claims arising under the FLSA subject to a separate Joint
5 Stipulation giving Plaintiff leave to amend his Complaint accordingly, and the parties have
6 scheduled mediation on July 8, 2016, with Mark Rudy. To reduce litigation costs and therefore
7 increase the likelihood of a successful mediation, the parties have agreed, subject to the Court's
8 entry of this Order, to limit further discovery prior to the July 8, 2016 mediation to the deposition of
9 Defendant's 30(b)(6) witnesses.

10 Therefore, the parties hereby request that the Court continue the currently scheduled
11 deadlines as follows:

- 12 • Phase I Discovery Cutoff: November 15, 2016
- 13 • Deadline to file motion for certification: December 16, 2016
- 14 • Deadline to file opposition: January 13, 2017
- 15 • Deadline to file reply: January 27, 2017

16 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD:**

17 Dated: May 13, 2016

SUTTON HAGUE LAW CORPORATION, P.C.

19 /s/ Jared Hague
20 S. BRETT SUTTON
21 JARED HAGUE
22 JOSEPH V. MACIAS
23 Attorneys for Plaintiff
24 TERRY T. SNIPES

LITTLER MENDELSON, PC

24 Dated: May 13, 2016

25 /s/ Lindbergh Porter
26 LINDBERGH PORTER
27 KURT R. BOCKES
28 JEFFREY J. MANN
LITTLER MENDELSON, P.C.
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DOLLAR TREE DISTRIBUTION, INC.


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ORDER

In accordance with the parties' agreement, and good cause appearing, the foregoing Joint Stipulation is hereby GRANTED. The dates stated on the parties' [Proposed] Discovery Schedule are hereby adopted. Given the extended deadlines, the hearing on Motion for Class Certification is continued from October 6, 2016 to February 9, 2017 at 2:00 p.m.

IT IS SO ORDERED.

DATED: May 25, 2016


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE