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 10 Attorneys for Defendants
 LKQ FOSTER AUTO PARTS, INC.
 11 LKQ CORPORATION, INC.

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 13 UNITED STATES DISTRICT COURT
 14 EASTERN DISTRICT OF CALIFORNIA
 15 SACRAMENTO DIVISION

16 SHLANDA JOHNSON, on behalf of)	Case No.: 2:15-cv-02413-KJM-AC
herself and all similarly situated)	
17 Aggrieved Employees)	Related Action: 2:16-cv-02175-TLN-DB
)	
18 Plaintiffs,)	JOINT STIPULATION AND ORDER
)	FOR FILING OF MASTER
19 vs.)	COMPLAINT, CONTINUANCE OF
)	TRIAL DATE AND RELATED
20 LKQ FOSTER AUTO PARTS, INC., LKQ)	DISCOVERY DEADLINES
CORPORATION, INC.; and DOES 1-50.)	
21 Defendants.)	Complaint Filed: 11/19/2015
)	Trial Date: September 25, 2017
22)	
23)	

24 IT IS HEREBY STIPULATED by and between Plaintiff SHLANDA JOHNSON
 25 (“Plaintiff”) and Defendants LKQ FOSTER AUTO PARTS, INC. and LKQ CORPORATION,
 26 INC. (“Defendants”), that GOOD CAUSE exists for Plaintiff to file a master complaint
 27 incorporating the claims she asserted in Case No. 2:16-cv-02175-TLN-DB and in Case No. 2:15-
 28 cv-02413-KJM-AC, and which the Court consolidated on April 20, 2017 under Case No. 2:15-

1 CV-2413 KJM AC. Plaintiff shall file her master complaint by May 15, 2017, and Defendants
2 shall have thirty (30) days (by or on June 15, 2017), in which to respond to Plaintiff's master
3 complaint.

4 GOOD CAUSE also exists to continue the current trial date set for September 25, 2017,
5 and all related deadlines, including all pretrial and discovery deadlines, for at least two hundred
6 ten (210) days, or to a date thereafter that is convenient for the Court.

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8 **IT IS SO STIPULATED.**

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10 Dated: May 2, 2017

By: /s/ Katarzyna W. Nowak
FISHER & PHILLIPS LLP
Nesheba M. Kittling
Katarzyna W. Nowak
Counsel for Defendants
LKQ FOSTER AUTO PARTS, INC.,
LKQ CORPORATION, INC.

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16 Dated: May 2, 2017

By: /s/ Barbara E. Figari
THE FIGARI LAW FIRM
Barbara E. Figari
Counsel for Plaintiff
SHLANDA JOHNSON

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ORDER

GOOD CAUSE appearing, the Court ORDERS as follows:

IT IS HEREBY ORDERED that Johnson v. LKQ Corporation, Inc., Case No. 2:16-cv-02175-TLN-DB and Johnson v. LKQ Foster Auto Parts, Inc., and LKQ Corporation, Inc., Case No. 2:15-cv-02413-KJM-AC, consolidated as 2:15-CV-2413 KJM AC, shall adhere to the following:

1) Plaintiff shall file a master complaint consisting of the claims she asserted in Case No. 2:16-cv-02175-TLN-DB and in Case No. 2:15-cv-02413-KJM-AC, and which the Court consolidated on April 20, 2017 under Case No. 2:15-CV-2413 KJM AC, by May 15, 2017.

2) Defendants shall have 30 days (by or on June 15, 2017), in which to respond to Plaintiff's master complaint.

3) The current trial date set for September 25, 2017, and all related deadlines, including all pretrial and discovery deadlines, shall be continued for a period of two hundred ten (210) days. The new scheduling for the case will be reflected in an amended scheduling order to issue.

IT IS SO ORDERED.

DATED: May 9, 2017.


UNITED STATES DISTRICT JUDGE