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Counsel listed on the following page

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

GERMAN TUGAS, on behalf of himself, all
others similarly situated, and on behalf of the
general public,

Plaintiff,

v.

HILL-ROM COMPANY, INC., and
DOES 1-100, inclusive,

Defendants.

Case No. 2:15-cv-02426-JAM-CKD

Assigned to The Honorable John A. Mendez

**STIPULATION REQUESTING
EXTENSION OF CURRENT DEADLINE
TO CONDUCT THE PARTIES' RULE
26(F) CONFERENCE AND TO FILE THE
JOINT STATUS REPORT**

Complaint filed August 24, 2015
First Amended Complaint filed December 21,
2015

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13 Attorneys for Defendant
14 HILL-ROM COMPANY, INC.
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1 **THIS STIPULATION** is hereby entered into by and between Plaintiff German Tugas and
2 Defendant Hill-Rom Company, Inc. (“Hill-Rom”) pursuant to Eastern District of California Local
3 Rule 143(a)(1).

4 **RECITALS**

5 **WHEREAS**, the Court issued an Order on Febreuary 19, 2016 requiring the parties to meet
6 and confer pursuant to Federal Rule of Civil Procedure 26(f) and to file a joint status report by April
7 18, 2016 (dkt. 12);

8 **WHEREAS**, the parties met and conferred and agreed that early mediation may be
9 productive;

10 **WHEREAS**, the parties scheduled a mediation with Mark Rudy, a highly respected wage
11 and hour class action mediator;

12 **WHEREAS**, the mediation is scheduled to take place on August 16, 2016, which was the
13 mediator’s earliest available mediation date;

14 **WHEREAS**, the parties agree to update the Court within 30 days after the completion of the
15 August 16, 2016 mediation and, if settlement is not achieved, the parties agree to file a Rule 26(f)
16 Report by September 15, 2016;

17 **WHEREAS**, the parties do not seek this continuance for purposes of delay, but, rather, to
18 efficiently and thoroughly manage the case in regards to timelines, substance, and procedure;

19 **NOW, THEREFORE**, the parties hereby stipulate to, and request that the Court order, that
20 the parties’ deadline to meet and confer pursuant to Federal Rule of Civil Procedure 26(f) and their
21 deadline to file a joint status report shall be extended until 30 days after the scheduled August 16,
22 2016 mediation, to September 15, 2016.

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24 **IT IS SO STIPULATED.**

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Dated: April 18, 2016

THE TURLEY LAW FIRM, APLC

By: /s/ William Turley
William Turley

Dated: April 18, 2016

WINSTON & STRAWN LLP

By: /s/ Joan Tucker Fife (as authorized on April 18, 2016)
Joan Tucker Fife

[PROPOSED] ORDER

Having considered the Joint Stipulation submitted by the parties, and for good cause appearing therefore, **IT IS SO ORDERED** that the parties shall update the court regarding the results of the mediation or meet and confer pursuant to Federal Rule of Civil Procedure 26(f) and file their joint status report by September 15, 2016.

Dated: 4/18/2016

/s/ John A. Mendez
Honorable John A. Mendez
United States District Court
Eastern District of California