

1 (Counsel of record listed on next page)

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

BRUCE KAUFMAN, an individual

Plaintiff,

vs.

RITE AID CORPORATION, and DOES 1
through 50, inclusive,

Defendants

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-01960 JAM-EFB;
2:14-CV-01963 JAM-EFB;
2:14-CV-01965 JAM-EFB;
2:15-CV-00623 JAM-EFB;
2:15-CV-02150 JAM-EFB;
2:15-CV-02396 JAM-EFB;
1:15-CV-01748 JAM-EFB;
2:15-CV-02597 JAM-EFB;
1:15-CV-01872 JAM-EFB;
1:15-CV-01874 JAM-EFB;
2:15-CV-02594 JAM-EFB;
2:16-CV-00174 JAM-EFB;
2:16-CV-00211 JAM-EFB;
2:16-CV-01028 JAM-EFB.

**STIPULATION TO EXTEND DISCOVERY
AND RELATED DEADLINES**

Judge: Hon. John A. Mendez

1 MATTHEW RIGHETTI (Cal. State Bar No. 121012)
JOHN GLUGOSKI (Cal. State Bar No. 191551)
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13 Attorneys for Defendant
Rite Aid Corporation
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1 Plaintiffs Bruce Kaufman, Chris Gonzalez, Kathryn Van Kopp, Keith Welday, Tom Bauser,
2 Mark Jaeger, Paul Neumann, Linda Willis, Akindale Carter, Bernadette Carter, Mike Campbell, Bart
3 Hillard, Joshua Roach, Gary Williams, Robert Hollandsworth, Louis Serpa, Agnes Marcallino, Bryce
4 Williams, Ramon Hurtado, Elaheh Salehi, Shannon Betts, Lisa Ladner, and Caren Winegarner
5 (“Plaintiffs”) and defendant Rite Aid Corporation (“Rite Aid”), acting through their respective counsel
6 of record, hereby stipulate, and respectfully request, that the Court grant a three-month extension of
7 discovery and all related deadlines for all related cases that do not currently have a trial date.

8 In support of their request, the parties stipulate as follows:

9 1. On June 9, 2016, this Court entered a scheduling order (ECF 46). The scheduling order
10 set April 28, 2017, for the close of discovery for all related cases, and October 23, 2017, as the trial date
11 for *Bruce Kaufman v. Rite Aid Corp.*, No. 2:14-CV-01961 JAM-EFB; *Chris Gonzalez v. Rite Aid Corp.*,
12 No. 2:14-CV-01963 JAM-EFB; and *Kathryn Van Kopp v. Rite Aid Corp.*, No. 2:14-CV-01965 JAM-
13 EFB. June 9, 2016 Order, at 5, 8. No other trial dates have been set.

14 2. The parties do not seek a discovery extension for *Kaufman*, *Gonzalez* or *Van Kopp* (i.e.,
15 the cases in which a trial date has been set).

16 3. The parties and their undersigned counsel currently have a trial scheduled in the Central
17 District of California in another Rite Aid Store Manager case on May 16, 2017.

18 4. The parties have diligently pursued discovery in these matters, have taken numerous
19 depositions, have served and responded to written discovery, and have produced thousands of
20 documents.

21 5. No previous discovery extensions have been sought or granted in these related matters.
22 This stipulation will not delay trial because the parties do not seek to extend discovery in any case with a
23 trial date.

24 6. In order to complete the many depositions needed in these related cases, and to
25 accommodate the schedules of parties and their counsel, the parties therefore agree and respectfully
26 request that the Court extend the discovery completion deadline, and all related deadlines, in the
27 following 14 actions not yet scheduled for trial:

- 28 ■ *Keith Welday v. Rite Aid Corp.*, No. 2:13-CV-02439 JAM-EFB;

- 1 ▪ *Tom Bauser v. Rite Aid Corp.*, No. 2:14-CV-01946 JAM-EFB;
- 2 ▪ *Mark Jaeger v. Rite Aid Corp.*, No. 2:14-CV-01960 JAM-EFB;
- 3 ▪ *Paul Neumann v. Rite Aid Corp.*, No. 2:15-CV-00623 JAM-EFB;
- 4 ▪ *James Kilgore et al. v. Rite Aid Corp.*, No. 2:15-CV-02150 JAM-EFB;
- 5 ▪ *Mike Campbell v. Rite Aid Corp.*, No. 2:15-CV-02396 JAM-EFB;
- 6 ▪ *Bart Hillard et al. v. Rite Aid Corp.*, No. 1:15-CV-01748 JAM-EFB;
- 7 ▪ *Robert Hollandsworth v. Aid Corp.*, No. 2:15-CV-02597 JAM-EFB;
- 8 ▪ *Destrea Bell et al. v. Rite Aid Corp.*, No. 1:15-CV-01872 JAM-EFB;
- 9 ▪ *Bryce Williams v. Rite Aid Corp.*, No. 1:15-CV-01874 JAM-EFB;
- 10 ▪ *Ramon Hurtado v. Rite Aid Corp.*, No. 2:15-CV-02594 JAM-EFB;
- 11 ▪ *Elaheh Salehi et al. v. Rite Aid Corp.*, No. 2:16-CV-00174 JAM-EFB;
- 12 ▪ *Lisa Ladner v. Rite Aid Corp.*, No. 2:16-CV-00211 JAM-EFB; and
- 13 ▪ *Caren Winegarner v. Rite Aid Corp.*, No. 2:16-CV-01028 JAM-EFB.

14 7. The parties respectfully request that the Court extend the deadlines in the cases listed
 15 above in paragraph 6, as follows:

- 16 ▪ Close of discovery extended from April 28, 2017, to July 28, 2017;
- 17 ▪ Dispositive motion deadline extended from July 11, 2017, to October 10, 2017; and
- 18 ▪ Dispositive motion hearing date extended from August 8, 2017, to November 7, 2017 at
 19 1:30 p.m.

20 This stipulation is filed by Justin M. Scott. All other signatories listed, and on whose behalf the
 21 filing is submitted, concur in the filing's content and have authorized this filing.

22 Dated: March 21, 2017.

22 MATTHEW RIGHETTI
 23 JOHN GLUGOSKI
 24 MICHAEL RIGHETTI
 24 RIGHETTI GLUGOSKI, P.C.

25 By: _____ */s/ Michael Righetti*
 26 Michael Righetti
 26 Attorneys for Plaintiffs

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Dated: March 21, 2017.

JEFFREY D. WOHL
JUSTIN M. SCOTT
PAUL HASTINGS LLP

By:
/s/ Justin M. Scott
Justin M. Scott
Attorneys for Defendant Rite Aid Corporation

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8 UNITED STATES DISTRICT COURT
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11 BRUCE KAUFMAN, an individual

12 Plaintiff,

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14 RITE AID CORPORATION, and DOES 1
15 through 50, inclusive,

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No. 2:14-CV-01961 JAM-EFB

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2:16-CV-00174 JAM-EFB;
2:16-CV-00211 JAM-EFB;
2:16-CV-01028 JAM-EFB.

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

Judge: Hon. John A. Mendez
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13 Attorneys for Defendant
Rite Aid Corporation
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1 On the stipulation of the parties, and good cause appearing therefor,

2 IT IS ORDERED that the deadlines in the following cases are extended as follows: (1) the close
3 of discovery is extended from April 28, 2017, to July 28, 2017; (2) the dispositive motion deadline is
4 extended from July 11, 2017, to October 10, 2017; and (3) the dispositive motion hearing date is
5 continued from August 8, 2017, to November 7, 2017 at 1:30 p.m.

6 This order applies only to the following related cases:

- 7 ■ *Keith Weldon v. Rite Aid Corp.*, No. 2:13-CV-02439 JAM-EFB;
- 8 ■ *Tom Bauser v. Rite Aid Corp.*, No. 2:14-CV-01946 JAM-EFB;
- 9 ■ *Mark Jaeger v. Rite Aid Corp.*, No. 2:14-CV-01960 JAM-EFB;
- 10 ■ *Paul Neumann v. Rite Aid Corp.*, No. 2:15-CV-00623 JAM-EFB;
- 11 ■ *James Kilgore et al. v. Rite Aid Corp.*, No. 2:15-CV-02150 JAM-EFB;
- 12 ■ *Mike Campbell v. Rite Aid Corp.*, No. 2:15-CV-02396 JAM-EFB;
- 13 ■ *Bart Hillard et al. v. Rite Aid Corp.*, No. 1:15-CV-01748 JAM-EFB;
- 14 ■ *Robert Hollandsworth v. Aid Corp.*, No. 2:15-CV-02597 JAM-EFB;
- 15 ■ *Destrea Bell et al. v. Rite Aid Corp.*, No. 1:15-CV-01872 JAM-EFB;
- 16 ■ *Bryce Williams v. Rite Aid Corp.*, No. 1:15-CV-01874 JAM-EFB;
- 17 ■ *Ramon Hurtado v. Rite Aid Corp.*, No. 2:15-CV-02594 JAM-EFB;
- 18 ■ *Elaheh Salehi et al. v. Rite Aid Corp.*, No. 2:16-CV-00174 JAM-EFB;
- 19 ■ *Aaron Guzman et al. v. Rite Aid Corp.*, No. 2:16-CV-00211 JAM-EFB; and
- 20 ■ *Caren Winegarner v. Rite Aid Corp.*, No. 2:16-CV-01028 JAM-EFB.

21 Dated: March 21, 2017.

22 /s/ John A. Mendez
23 John A. Mendez
24 United States District Court Judge