

1 (Counsel of record listed on next page)

2

3

4

5

6

7

8

UNITED STATES DISTRICT COURT

9

EASTERN DISTRICT OF CALIFORNIA

10

11 BRUCE KAUFMAN, an individual

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

12

Plaintiff,

Related to Nos.

13

vs.

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;

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

2:15-CV-00623 JAM-EFB;

2:15-CV-02150 JAM-EFB;

2:15-CV-02396 JAM-EFB;

1:15-CV-01748 JAM-EFB;

17 Defendants

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.

21

**STIPULATION TO EXTEND DISCOVERY
AND RELATED DEADLINES**

22

Judge: Hon. John A. Mendez

23

24

25

26

27

28

1 MATTHEW RIGHETTI (Cal. State Bar No. 121012)
JOHN GLUGOSKI (Cal. State Bar No. 191551)
2 MICHAEL RIGHETTI (Cal. State Bar No. 258541)
RIGHETTI GLUGOSKI, P.C.
3 456 Montgomery Street, Suite 1400
San Francisco, California 94104
4 Telephone: (415) 983-0900
Facsimile: (415) 397-9005
5 matt@righettilaw.com
john@righettilaw.com
6 mike@righettilaw.com

7 Attorneys for Plaintiffs

8 JEFFREY D. WOHL (Cal. State Bar No. 096838)
JUSTIN M. SCOTT (Cal. State Bar No. 302502)
9 PAUL HASTINGS LLP
55 Second Street, 24th Floor
10 San Francisco, California 94105-3441
Telephone: (415) 856-7000
11 Facsimile: (415) 856-7100
jeffwohl@paulhastings.com
12 justinscott@paulhastings.com

13 Attorneys for Defendant
Rite Aid Corporation
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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 (Counsel of record listed on next page)
2
3
4
5
6
7

8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 BRUCE KAUFMAN, an individual

12 Plaintiff,

13 vs.
14

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

17 Defendants
18
19
20
21
22

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.

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

23 Judge: Hon. John A. Mendez
24
25
26
27
28

1 MATTHEW RIGHETTI (Cal. State Bar No. 121012)
JOHN GLUGOSKI (Cal. State Bar No. 191551)
2 MICHAEL RIGHETTI (Cal. State Bar No. 258541)
RIGHETTI GLUGOSKI, P.C.
3 456 Montgomery Street, Suite 1400
San Francisco, California 94104
4 Telephone: (415) 983-0900
Facsimile: (415) 397-9005
5 matt@righettilaw.com
john@righettilaw.com
6 mike@righettilaw.com

7 Attorneys for Plaintiffs

8 JEFFREY D. WOHL (Cal. State Bar No. 096838)
JUSTIN M. SCOTT (Cal. State Bar No. 302502)
9 PAUL HASTINGS LLP
55 Second Street, 24th Floor
10 San Francisco, California 94105-3441
Telephone: (415) 856-7000
11 Facsimile: (415) 856-7100
jeffwohl@paulhastings.com
12 justinscott@paulhastings.com

13 Attorneys for Defendant
Rite Aid Corporation
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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