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10 an individual, on behalf of himself, and on
11 behalf of all other persons similarly situated

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21 Attorneys for Defendant,
22 SUGAR TRANSPORT OF THE NORTHWEST, INC.

23 **IN THE UNITED STATES DISTRICT COURT**
24 **IN AND FOR THE EASTERN DISTRICT OF CALIFORNIA**
25 **SACRAMENTO DIVISION**

26 RYAN GUINN, an individual, on behalf of
27 himself, and on behalf of all other persons
28 similarly situated,

Plaintiffs,

vs.

SUGAR TRANSPORT OF THE
NORTHWEST, INC., a California
corporation, *et al.*,

Defendants.

Case No.: 2:16-cv-00325-WBS-EFB

**STIPULATION AND [PROPOSED]
ORDER EXTENDING SCHEDULED
DATE FOR FILING MOTION FOR
CLASS CERTIFICATION**

Judge: Hon. William B. Shubb
Courtroom: 5

1 COME NOW, Plaintiff, RYAN GUINN (“Plaintiff”), and Defendant, SUGAR
2 TRANSPORT OF THE NORTHWEST, INC. (“Defendant”) (hereafter, when referenced to in a
3 collective manner, Plaintiff and Defendants will be referred to collectively as “the Parties”), by
4 and through their respective attorneys of record, and they hereby stipulate and agree as follows:

5
6 WHEREAS, on August 24, 2016, the Court entered a stipulated order, titled “Stipulation
7 and Order Extending Scheduled Dates for Settlement Efforts,” Document 33 (“Revised
8 Scheduling Order”), revising the Scheduling Order in this Case;

9
10 WHEREAS, according to the referenced Revised Scheduling Order, the deadline for
11 Plaintiff to file a motion for class certification is Tuesday, January 31, 2017;

12
13 WHEREAS, on January 24, 2017, the Court, on Plaintiff’s motion, entered an order
14 granting Plaintiff leave to amend his complaint in this Case to add two additional defendants,
15 Bronco Wine Company and Classic Wines of California (collectively as “Newly Added
16 Defendants”);

17
18 WHEREAS, the Parties believe it would be best to address class certification issues after
19 the Newly Added Defendants have appeared in the Case through a single motion and hearing;

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21 WHEREAS, the Parties believe the balance of the revised Scheduling Order should be
22 revised, but believe they should do so only after the Newly Added Defendants appear in the
23 Case and, thereafter, provide their input regarding the proposed schedule;

24
25 THEREFORE, the Parties hereto stipulate and agree that the following deadline
26 previously scheduled by the Court through the Revised Scheduling Order be extended as
27 follows:

28 The deadline for Plaintiff to file a motion for class certification be extended from
January 31, 2017 to **May 1, 2017**.

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IT IS SO STIPULATED.

Dated: January 26, 2017

Respectfully submitted,

PAGANO & KASS, APC

/s/ Ian A. Kass

JAMES L. PAGANO, ESQ.,
IAN A. KASS, ESQ.,
Attorneys for Plaintiff, Ryan Guinn

Dated: January 26, 2017

DOWNEY BRAND, LLP

/s/ Cassandra M. Ferrannini, Esq.

CASSANDRA M. FERRANNINI, ESQ.,
ALEXANDRA K. LAFOUNTAIN, ESQ.,
Attorneys for Defendant,
Sugar Transport of the Northwest, Inc.

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2 **ORDER**

3 GOOD CAUSE APPEARING, it is hereby ORDERED that the “Stipulation and Order
4 Extending Scheduled Dates for Settlement Efforts,” Document 33, entered in the above-
5 captioned matter on August 24, 2016, is modified to extend the deadlines as follows:

6 The deadline for Plaintiff to file a motion for class certification be extended from
7 January 31, 2017 to **May 1, 2017**.

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9 IT IS SO ORDERED.

10 Dated: January 26, 2017

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12 WILLIAM B. SHUBB
13 UNITED STATES DISTRICT JUDGE
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