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

UNITED STATES DISTRICT COURT  
 EASTERN DISTRICT OF CALIFORNIA

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

Plaintiffs,

v.

SUGAR TRANSPORT OF THE  
 NORTHWEST, INC.; BRONCO WINE  
 COMPANY, a California corporation;  
 CLASSIC WINES OF CALIFORNIA, a  
 California corporation, a California  
 corporation, and DOES 1 through 100,

Defendants.

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

**CLASS ACTION**

**STIPULATION CONTINUING MOTION  
 FOR PROCEEDING AS COLLECTIVE  
 ACTION AND FOR CLASS  
 CERTIFICATION HEARING;  
 [PROPOSED] ORDER**

Defendant SUGAR TRANSPORT OF THE NORTHWEST, INC. (“Sugar Transport”),  
 BRONCO WINE COMPANY AND CLASSIC WINES OF CALIFORNIA (“Bronco”)  
 (collectively “Defendants”), and Plaintiff RYAN GUINN (“Plaintiff”) (collectively the “Parties”),  
 by and through their respective counsel of record, stipulate as follows:

**RECITALS**

1. On September 18, 2017, Plaintiff’s filed a Motion for Proceeding as Collective  
 Action and for Class Certification (“Motion”). The hearing date was set for October 30, 2017.

2. Plaintiff’s responses to Sugar Transport’s written discovery were originally due on

1 September 11, 2017; Plaintiff requested an extension until September 18, 2017 to respond to that  
2 discovery. Sugar Transport granted that extension with the understanding that: (1) this discovery  
3 was necessary to Sugar Transport's Opposition to the Motion; and (2) the discovery responses  
4 would be "meaningful."

5 3. On September 18, 2017, Plaintiff served responses to discovery, but failed to  
6 produce any documents and, despite asserting the attorney-client privilege multiple times, failed to  
7 provide a privilege log. Sugar Transport and Plaintiff are currently in the process of meeting and  
8 conferring on this issue. Plaintiff provided a portion of the requested documents on October 12,  
9 2017, as well as a privilege log. Sugar Transport has yet to have an opportunity to review this  
10 additional material. Sugar Transport and Bronco will copy the remainder of the documents  
11 Plaintiff intends to produce at the office of his counsel early next week.

12 4. Sugar Transport and Bronco also noticed the depositions of five individuals to take  
13 place between October 6 and October 11, 2017 with the intention of completing those depositions  
14 in time for use in the Parties' respective Oppositions to the Motion. At Plaintiff's request, and  
15 pursuant to Plaintiff's agreement to move the hearing date on the Motion to December 18, 2017,  
16 Defendants agreed to continue the depositions. These depositions are now rescheduled to take  
17 place between October 23, 2017, and November 6, 2017.

### 18 STIPULATION

19 The hearing date on the Motion shall be held on December 18, 2017, with briefing to  
20 follow the new hearing date.

21 IT IS SO STIPULATED.

22 DATED: October 13, 2017

DOWNEY BRAND LLP

23  
24 By: /s/ Cassandra M. Ferrannini

CASSANDRA M. FERRANNINI

KATIE L. PATTERSON

Attorney for Defendant

SUGAR TRANSPORT OF THE NORTHWEST,  
INC.

DATED: October 13, 2017

PAGANO & KASS, APC

By: /s/ James L. Pagano (as authorized on 10/13/17)

JAMES L. PAGANO

IAN A. KASS

Attorney for Plaintiff

RYAN GUINN

DATED: October 13, 2017

RODARAKIS & SOUSA, APC

By: /s/ Eric J. Sousa (as authorized on 10/13/17)

ERIC J. SOUSA

Attorney for Defendants

BRONCO WINE COMPANY AND CLASSIC

WINES OF CALIFORNIA

**[PROPOSED] ORDER**

The hearing date on Plaintiff's Motion for Proceeding as Collective Action and for Class Certification is hereby moved to December 18, 2017 at 1:30 p.m., with briefing in accordance with the Local Rules.

IT IS SO ORDERED.

Dated: October 13, 2017

WILLIAM B. SHUBB

UNITED STATES DISTRICT JUDGE