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9 Attorneys for Defendants Kraft Heinz Company
 (improperly sued as Kraft Heinz Foods Company)

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 11 [ADDITIONAL COUNSEL ON SIGNATURE PAGE]

12
 13 UNITED STATES DISTRICT COURT
 14 EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

15
 16 GEORGE BRAHLER, individually and on
 behalf of all others similarly situated,

17
 18 Plaintiff,

19 v.

20 KRAFT HEINZ FOODS COMPANY,

21 Defendant.

Case No. 2:16-cv-849 KJM EFB

The Honorable Kimberly J. Mueller

**JOINT STIPULATION TO STAY AND
 ORDER**

1 **JOINT STIPULATION TO STAY**

2 WHEREAS:

- 3 (1) Plaintiff George Brahler filed his Class Action Complaint on April 25, 2016; and
4 (2) The deadline for Defendant Kraft Heinz Company (“Kraft Heinz”) to respond to
5 Plaintiff’s Class Action Complaint is June 27, 2016; and
6 (3) At least twenty other similar complaints have been filed against Kraft Heinz across the
7 country, and plaintiffs in five of those cases filed petitions with the United States Judicial Panel
8 on Multidistrict Litigation (the “JPML”) seeking to centralize all of the Parmesan-related
9 lawsuits against Kraft Heinz in a common jurisdiction; and
10 (4) The JPML has scheduled oral argument on those MDL petitions, *In re: 100% Grated*
11 *Parmesan Cheese Marketing and Sales Practices Litigation*, MDL No. 2705; *In re: Kraft 100%*
12 *Grated Parmesan Cheese Marketing and Sales Practices Litigation*, MDL No. 2707, as well as a
13 related MDL petition, *In re: Walmart Great Value 100% Grated Parmesan Cheese Marketing*
14 *and Sales Practices Litigation*, MDL NO. 2708, on May 26, 2016 and will likely issue its
15 decision regarding centralization in June 2016; and
16 (5) In light of the petitions before the JPML and the potential need to coordinate the related
17 cases, the parties agree that a brief stay of proceedings pending the JPML’s decision is
18 appropriate because it would avoid the need for unnecessary and duplicative discovery and
19 motion practice by the parties and conserve valuable judicial resources;

20 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between
21 the undersigned counsel of record that this case be STAYED pending the JPML’s ruling on
22 MDL Petitions 2705, 2707, and 2708. The parties shall submit a joint status report to this Court
23 within five (5) days of the JPML’s ruling.

24 DATED: May 9, 2016 KELLER ROHRBACK LLP

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26 By: _____ /s/ Matthew J. Preusch

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Matthew J. Preusch

Attorneys for Plaintiff
George Brahler

DATED: May 9, 2016

JENNER & BLOCK LLP

By: /s/ **Kenneth K. Lee**
Kenneth K. Lee

Attorneys for Defendant
Kraft Heinz Company

ORDER

Good cause appearing, the court GRANTS the parties’ stipulation to stay the case pending the JPML’s ruling on MDL Petitions 2705, 2707, and 2708 (ECF No. 12). The parties shall submit a joint status report to this court within five (5) days of the JPML’s ruling.

IT IS SO ORDERED.

Dated: May 16, 2016



UNITED STATES DISTRICT JUDGE