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15 UNITED STATES DISTRICT COURT  
16 EASTERN DISTRICT OF CALIFORNIA

18 JESUS SILVA RODRIGUEZ &  
RIGOBERTO ZEPEDA LOA,

19 Plaintiffs,

20 v.

21 RCO REFORESTING, INC. &  
ROBERTO OCHOA,

22 Defendants.  
23

CASE NO.: 2:16-cv-02523-WBS-CMK

**STIPULATION & [PROPOSED] ORDER  
RE COLLECTIVE ACTION NOTICE  
PERIOD AND TOLLING OF FLSA  
STATUTE OF LIMITATIONS**

Hon. William B. Shubb

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9  
10 On August 8, 2017, the Court ordered Defendants to produce to Plaintiffs the names,  
11 addresses, and telephone numbers of potential class members within fourteen days. Defendants  
12 made an initial production of employee names and contact information to Plaintiffs on August  
13 23, 2013. Dkt. No. 42. This production, however, did not include contact information for most  
14 of the employees listed. Defendants made additional productions of contact information on  
15 August 31 and September 7, 2017. Defendants to date, however, have not produced any contact  
16 information for numerous employees; and for most employees, Defendants have not provided an  
17 address other than the employee's Mexican state of residence.

18 Accordingly, the parties agree that the FLSA collective action opt-in period set by the  
19 Court to expire six months after its August 8, 2017 order (i.e., by February 8, 2018) shall be  
20 extended two months, until April 9, 2018 to allow plaintiffs additional time to locate class  
21 members. *See, e.g., Ott v. Publix Super Mkts., Inc.*, 298 F.R.D. 550, 558 (M.D. Tenn.  
22 2014) (extending opt-in period after many of class notices were returned to plaintiffs' counsel as  
23 undeliverable). All case deadlines listed in the Court's order of August 8, 2017 (Dkt. No. 42 at  
24 12) shall be extended two months, as follows:

25 Expert Reports are due March 30, 2018;

26 All discovery closes June 4, 2018;

27 All motions shall be filed by June 18, 2018;  
28

