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13 **UNITED STATES DISTRICT COURT**  
 14 **EASTERN DISTRICT OF CALIFORNIA**

15 TOM TAKANO and TRACY MCCARTHY,  
 on behalf of themselves and all others similarly  
 16 situated,  
 17 Plaintiffs,  
 18 v.  
 19 THE PROCTER & GAMBLE COMPANY,  
 20 Defendant.

Case No. 2:17-cv-00385 TLN-AC

**JOINT STIPULATION AND ORDER  
 EXTENDING DEFENDANT THE  
 PROCTER & GAMBLE COMPANY'S  
 TIME TO ANSWER THE COMPLAINT**

Judge: Hon. Troy L. Nunley

21 WHEREAS, Plaintiffs Tom Takano and Tracy McCarthy ("Plaintiffs") filed their Class  
 22 Action Complaint ("Complaint") in this action on February 21, 2017.

23 WHEREAS, Defendant Procter & Gamble Company ("P&G") filed a motion to dismiss on  
 24 March 29, 2017, which was ruled upon by this Court on October 24, 2018, and therefore the date by  
 25 which P&G must respond to the Complaint currently is set for November 7, 2018.

26 WHEREAS, in accordance with Local Rule 144, the Plaintiffs and P&G have agreed to  
 27 extend the time for P&G to answer the Complaint up to and including December 5, 2018, which is  
 28 28 days from the date that the answer is currently due and does not exceed the 28 days allowed

1 under Local Rule 144. This is the first extension of time to respond to the Complaint agreed to by  
2 Plaintiffs and P&G.

3 ACCORDINGLY, IT IS HEREBY STIPULATED by and between the Plaintiffs and The  
4 Procter & Gamble Co., through their respective counsel, that P&G's time to answer the Complaint  
5 shall be extended to December 5, 2018. Pursuant to Local Rule 144(a), approval of this stipulation  
6 by the Court is not necessary.

7 Dated: November 2, 2018

**REED SMITH LLP**

8 By: /s/ Raymond A. Cardozo  
9 Raymond A. Cardozo

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14 Dated: November 2, 2018

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15 By: /s Yeremey Krivoshey (as authorized on 10/30/2018  
16 Yeremey Krivoshey

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Dated: November 6, 2018



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HONORABLE TROY L. NUNLEY  
UNITED STATES DISTRICT COURT JUDGE