

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

REED SMITH LLP
Raymond A. Cardozo (State Bar No. 173263)
101 Second Street, Suite 1800
San Francisco, CA 94105-3659
Telephone: (415) 543-8700
Facsimile: (415) 391-8269
E-Mail: rcardozo@reedsmith.com
Facsimile: (925) 407-2700
Counsel for Defendant

BURSOR & FISHER, P.A.
L. Timothy Fisher (State Bar No. 191626)
Joel D. Smith (State Bar No. 244902)
Yeremey O. Krivoshey (State Bar No. 295032)
1990 North California Blvd., Suite 940
Walnut Creek, CA 94596
Telephone: (925) 300-4455
E-Mail: ltfisher@bursor.com
jsmith@bursor.com
ykrivoshey@bursor.com

BURSOR & FISHER, P.A.
Scott A. Bursor (State Bar No. 276006)
888 Seventh Avenue
New York, NY 10019
Telephone: (212) 989-9113
Facsimile: (212) 989-9163
E-Mail: scott@bursor.com
Counsel for Plaintiffs

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

TOM TAKANO and TRACY MCCARTHY,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

THE PROCTER & GAMBLE COMPANY,

Defendant.

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

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

Judge: Hon. Troy L. Nunley

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

WHEREAS, the Parties are finalizing their discussions to resolve this action.

WHEREAS, in accordance with Local Rule 144, the Plaintiffs and P&G have agreed to extend the time for P&G to answer the Complaint up to and including January 16, 2019, which is 14 days from the date that the answer is currently due, January 2, 2019. This is the third extension of time to respond to the Complaint agreed to by Plaintiffs and P&G. The previous

1 agreement of an extension extended the date that the answer was due from November 7, 2018 to
2 December 5, 2018, and the second extension was from December 5, 2018 to January 2, 2019.

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
5 Complaint shall be extended up to and including January 16, 2019. Pursuant to Local Rule
6 144(a), approval of this stipulation by the Court is necessary.

7 Dated: December 28, 2018

REED SMITH LLP

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

10 Raymond A. Cardozo (State Bar No. 173263)
11 101 Second Street, Suite 1800
12 San Francisco, CA 94105-3659
13 Telephone: (415) 543-8700
14 Facsimile: (415) 391-8269
15 E-Mail: rcardozo@reedsmith.com

16 *Counsel for Defendant*

17 Dated: December 27, 2018

BURSOR & FISHER, P.A.

18 By: /s/ Yeremey Krivoshey
19 Yeremey Krivoshey

20 L. Timothy Fisher (State Bar No. 191626)
21 Joel D. Smith (State Bar No. 244902)
22 Yeremey O. Krivoshey (State Bar No. 295032)
23 1990 North California Blvd., Suite 940
24 Walnut Creek, CA 94596
25 Telephone: (925) 300-4455
26 Facsimile: (925) 407-2700
27 Email: ltfisher@bursor.com
28 jsmith@bursor.com
ykrivoshey@bursor.com

BURSOR & FISHER, P.A.

Scott A. Bursor (State Bar No. 276006)
888 Seventh Avenue
New York, NY 10019
Telephone: (212) 989-9113
Facsimile: (212) 989-9163
E-Mail: scott@bursor.com

Counsel for Plaintiffs

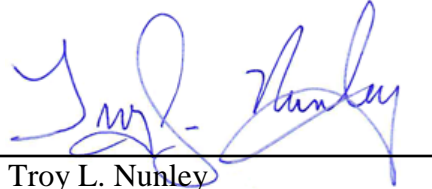
1 **SO ORDERED.**

2

3 Dated: January 2, 2019

4

5



6 Troy L. Nunley
7 United States District Judge

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28