

1 Brad Seligman (SBN 083838)
 Jocelyn D. Larkin (SBN 110817)
 2 THE IMPACT FUND
 125 University Avenue
 3 Berkeley, CA 94710
 Telephone: 510.845.3473
 4 Facsimile: 510.845.3654

Joseph M. Sellers
 Christine E. Webber
 Jenny R. Yang
 COHEN MILSTEIN SELLERS & TOLL
 PLLC
 West Tower, Suite 500
 1100 New York Avenue
 Washington, DC 20005
 Telephone: 202.408.4600
 Facsimile: 202.408.4699

6 Attorneys for Plaintiffs

7 Theodore J. Boutrous, Jr. (SBN 132099)
 8 GIBSON, DUNN & CRUTCHER LLP
 333 South Grand Avenue
 9 Los Angeles, CA 90071
 Telephone: 213.229.7000
 10 Facsimile: 213.229.7520
 TBoutrous@gibsondunn.com

12 Attorney for Defendant

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN FRANCISCO DIVISION

16 BETTY DUKES, PATRICIA SURGESON, EDITH ARANA,
 17 DEBORAH GUNTER, and CHRISTINE KWAPNOSKI, on
 behalf of themselves and all others similarly situated,

18 Plaintiffs,

19 v.

20 WAL-MART STORES, INC.,

21 Defendant.

Case No. 01-cv-2252-CRB
 STIPULATION OF CONSENT
 TO THE FILING OF THE
 FOURTH AMENDED
 COMPLAINT AND THE
 EXTENSION OF TIME FOR
 DEFENDANT WAL-MART
 STORES, INC. TO RESPOND
 TO COMPLAINT AND
~~PROPOSED~~ ORDER

22 The undersigned counsel, on behalf of Betty Dukes, Patricia Surgeson, Edith Arana,
 23 Deborah Gunter, and Christine Kwapnoski (“Plaintiffs”) and Defendant Wal-Mart Stores, Inc.
 24 (“Wal-Mart”), hereby stipulate and agree as follows:

25 WHEREAS, Plaintiffs intend to file a Fourth Amended Complaint in the above-captioned
 26 case against Defendant Wal-Mart on October 27, 2011 before 11:00 AM PDT;

27 WHEREAS, Wal-Mart consents to Plaintiffs’ filing of the Fourth Amended Complaint

28 STIPULATION OF EXTENSION OF TIME FOR DEFENDANT WAL-MART STORES,
 INC. AND [PROPOSED] ORDER, CASE No. 01-cv-2252-CRB

1 pursuant to Federal Rule of Civil Procedure 15(a)(2);

2 WHEREAS, Wal-Mart's consent to the filing of the Fourth Amended Complaint shall not
3 be construed as expressing agreement or disagreement with any factual allegation or legal theory
4 set forth therein, such matters to be resolved in the appropriate course following the filing of the
5 Fourth Amended Complaint;

6 WHEREAS, Plaintiffs and Wal-Mart have reached an agreement, pursuant to Civil L.R.
7 6-1(a), to extend the time within which Wal-Mart must answer or otherwise respond to Plaintiffs'
8 Fourth Amended Complaint and that a corresponding amount of additional time should be
9 provided to Plaintiffs to address any motion by Wal-Mart regarding Plaintiffs' Fourth Amended
10 Complaint;

11 WHEREAS, Plaintiffs and Wal-Mart further agree that to avoid potentially redundant
12 motion practice, briefing, or responsive pleadings, any motion challenging the Fourth Amended
13 Complaint should be resolved by the Court prior to the filing of an Answer by Wal-Mart;

14 WHEREAS, this extension will not alter the date of any event or any deadline already
15 fixed by the Court;

16 THEREFORE, Plaintiffs and Wal-Mart stipulate and agree as follows:

17 1. Plaintiffs may file the Fourth Amended Complaint on October 27, 2011, pursuant
18 to Rule 15(a)(2);

19 2. The deadline by which Wal-Mart must answer or otherwise respond to Plaintiffs'
20 Fourth Amended Complaint is extended to January 6, 2012;

21 3. Should Wal-Mart move against the Fourth Amended Complaint within the time
22 period specified in paragraph 2, an opposition to any such motion shall be filed no later than
23 March 16, 2012, and a reply, if one is to be filed, shall be filed no later than April 13, 2012;

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1 4. Should Wal-Mart move against the Fourth Amended Complaint, any answer to
2 that Fourth Amended Complaint shall be filed within thirty (30) days following the entry of an
3 order resolving Wal-Mart's motion.

4 IT IS SO STIPULATED.

5 Dated: October 26, 2011

6 By: /s/ Brad Seligman

By: /s/ Theodore J. Boutrous, Jr.

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8 Jocelyn D. Larkin (SBN 110817)
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11 Berkeley, CA 94710
12 Telephone: 510.845.3473
13 Facsimile: 510.845.3654

Theodore J. Boutrous, Jr. (SBN 132099)
GIBSON, DUNN & CRUTCHER LLP
333 South Grand Avenue
Los Angeles, CA 90071
Telephone: 213.229.7000
Facsimile: 213.229.7520

11 Attorneys for Plaintiffs

Attorney for Defendant

**I, Theodore J. Boutrous, Jr., attest that
concurrence in the filing of this document
has been obtained from the other signatory.**

15 PURSUANT TO STIPULATION, IT IS SO ORDERED

17 DATE: October 28, 2011

