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15 Attorneys for Defendant WAL-MART STORES, INC.

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA
 18 SAN FRANCISCO DIVISION

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

21 Plaintiffs,

22 v.

23 WAL-MART STORES, INC.,

24 Defendant.

Case No. C-01-2252-CRB

**STIPULATION AND
~~PROPOSED~~ ORDER
 REGARDING SCHEDULE
 FOR RESPONSE TO
 MOTION TO EXCLUDE
 DECLARATION OF DR.
 DROGIN**

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 27 The undersigned counsel, on behalf of Plaintiffs Betty Dukes, Patricia Surgeson, Edith
 28 Arana, Deborah Gunter, and Christine Kwapnoski (“Plaintiffs”) and Defendant Wal-Mart Stores, Inc.

1 (“Wal-Mart,” and collectively, with Plaintiffs, the “Parties”), hereby stipulate as follows:

2 WHEREAS Defendant filed its motion to exclude the declaration of Dr. Richard Drogin on May 31,
3 2013, such that Plaintiffs’ opposition would otherwise be due on June 14, 2013; and

4 WHEREAS the motion includes reference to the declaration of Dr. Edward Lazear, Defendant’s
5 expert, but Dr. Lazear’s schedule makes him unavailable for deposition prior to June 17, 2014; and

6 WHEREAS Plaintiffs request, and Wal-Mart does not oppose, the opportunity to depose Dr. Lazear
7 before responding to the motion to exclude Dr. Drogin;

8
9 THEREFORE, the Parties stipulate as follows:

10 1. Plaintiffs’ Opposition to Defendant’s Motion to Exclude the Declaration of Dr. Drogin
11 shall be filed on June 19, 2013, by 5:00 pm PDT;

12 2. Wal-Mart’s Reply in Support of its Motion to Exclude shall be filed on or before 5:00
13 pm PDT on June 26, 2013.

14 3. This stipulation does not alter the hearing date on Plaintiffs’ pending motion for class
15 certification or otherwise alter the briefing schedule for that or any related motions.

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18 IT IS SO STIPULATED.

19 Dated: June 6, 2013

20
21 By: /s/Christine E. Webber

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

22 Joseph M. Sellers
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Attorneys for Defendant

26 **I, Christine E. Webber, attest that**
27 **concurrence in the filing of this document**
28 **has been obtained from the other**
signatory.

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~~PROPOSED~~ ORDER

Pursuant to the above stipulation, the Stipulation and Order regarding schedule for briefing on Defendant's Motion to Exclude the Declaration of Dr. Drogin is approved.

DATE: June 12, 2013

