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16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA

19 Dean Alexander, et al.,
 20 Plaintiffs,
 21 v.
 22 FedEx Ground Package System, Inc., et al.,
 23 Defendant.

Case No. 3:05-cv-38 EMC

**JOINT STIPULATION AND
 [PROPOSED] ORDER TO EXTEND
 TIME TO FILE INITIAL MOTIONS
 AND OPPOSITIONS**

Hearing Date: July 30, 2015
 Judge: Hon. Edward M. Chen

1 **JOINT STIPULATION EXTENDING TIME TO FILE INITIAL MOTIONS AND**
2 **OPPOSITIONS**

3 WHEREAS, on April 6, 2015, the Court adopted the Proposed Case Management Order
4 filed by FedEx Ground Package System, Inc., on April 2, 2015 (ECF No. 102);

5 WHEREAS, that Order set forth a briefing schedule by which the Defendant's initial
6 motions are due May 14, 2015, Plaintiffs' oppositions are due June 25, 2015, Defendant's replies
7 are due July 15, 2015, and a hearing is scheduled for July 30, 2015;

8 WHEREAS, those motions include (1) a motion to clarify the class definitions with
9 respect to the requirement that class members "drove a vehicle on a full-time basis (meaning
10 exclusive of time off for commonly excused employment absences)"; (2) a motion to limit
11 Plaintiffs' recoverable damages period; and (3) a motion to limit Plaintiffs' recovery for certain
12 categories of work-related expenses under the California Labor Code;

13 WHEREAS, parties are attempting to reach stipulations and agreements regarding a
14 number of potentially contested issues in these motions;

15 WHEREAS, parties agree that an extension in the briefing schedule would assist in this
16 process;

17 WHEREAS, Plaintiffs consent to an extension of the time for FedEx Ground Package
18 System, Inc., to file its initial motions to May 21, 2015;

19 WHEREAS, Defendant consents to an extension of the time for Plaintiffs to file its
20 oppositions to July 1, 2015;

21 WHEREAS, this extension will not change the July 15, 2015 filing deadline for
22 Defendant's replies, nor will it change the July 30, 2015 hearing date set by the Court;

23 THEREFORE, IT IS HEREBY STIPULATED by Plaintiffs and FedEx Ground Package
24 System, Inc., through their counsel of record, that FedEx Ground Package System, Inc., will have
25 up to and including May 21, 2015, to file its motions, and Plaintiffs will have up to and including
26 July 1, 2015, to file their oppositions to those motions.
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Dated: May 13, 2015

By: /s/ Beth A. Ross
Beth A. Ross

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ORDER

PURSUANT TO STIPULATION, the Court orders the following schedule for briefing and argument of the motions described above:

Event / Item Due	Date / Deadline
Defendant's Motions Due	May 21, 2015
Plaintiffs' Oppositions to Motions Due	July 1, 2015
Defendant's Replies to Motions Due	July 15, 2015
Motions Heard	July 30, 2015

Dated: May ¹³__, 2015

