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19 UNITED STATES DISTRICT COURT
 20 NORTHERN DISTRICT OF CALIFORNIA
 21 SAN FRANCISCO DIVISION

22 MELISSA S. CURRIE-WHITE,
 individually and on behalf of all others
 23 similarly situated,

24 Plaintiff,

25 vs.

26 BLOCKBUSTER INC.; and DOES 1
 through 50, inclusive,

27 Defendants.

Case No. 3:09-CV-02593 MMC

**STIPULATION AND ~~PROPOSED~~
 ORDER FURTHER EXTENDING
 PRETRIAL PREPARATION ORDER
 DATES**

1 Plaintiff Melissa Currie-White (“Plaintiff”) and Defendant Blockbuster Inc.
2 (“Blockbuster”), the parties to the above-entitled action (collectively referred to herein as the
3 “Parties”), submit this Stipulation to the Court:

4 **STIPULATION**

5 WHEREAS, on February 12, 2010, the Court issued an Order Extending Pretrial
6 Preparation Order Dates (the “Order Extending Dates”) upon good cause shown.

7 WHEREAS, a discovery dispute arose regarding Plaintiff’s request for contact
8 information of putative class members arose in this action. On February 16, 2010, the Parties
9 submitted a joint letter brief to Magistrate Maria-Elena James, requesting an order resolving this
10 matter. On April 15, 2010, Magistrate James issued a ruling ordering the disclosure of contact
11 information of certain putative class members from the two stores in which Plaintiff has worked
12 and from ten additional stores of Plaintiff’s choosing.

13 WHEREAS, Defendant has compiled a list of stores and provided it to Plaintiff from
14 which Plaintiff can select the ten additional stores.

15 WHEREAS, after Plaintiff selects ten stores from the list, Defendant will need additional
16 time to compile and provide to Plaintiff the contact information of certain putative class members
17 from those stores.

18 WHEREAS, after receiving the contact information, Plaintiff anticipates requiring
19 additional time to contact certain putative class members.

20 WHEREAS, Plaintiff anticipates the potential need to amend its pleading after receiving
21 the contact information.

22 WHEREAS, per the Order Extending Dates, the deadline to amend the pleadings currently
23 is set for May 14, 2010.

24 WHEREAS, per the Order Extending Dates, Plaintiff’s deadline to file a Motion for Class
25 Certification currently is set for May 21, 2010 and the hearing on such motion currently is set for
26 September 10, 2010.

27 WHEREAS, the Parties anticipate the potential need to conduct additional non-expert
28 discovery after receiving a ruling on Plaintiff’s anticipated Motion for Class Certification.

1 WHEREAS, per the Order Extending Dates, the Non-Expert Discovery Cut-Off currently
2 is scheduled for October 29, 2010.

3 WHEREAS, in light of the above factors, the Parties have agreed to seek to extend the
4 deadlines related to Plaintiff's anticipated Motion for Class Certification, the deadline to amend
5 the pleadings, and Non-Expert Discovery Cut-Off by five weeks.

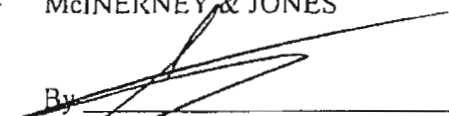
6 NOW, THEREFORE the Parties, through their undersigned respective counsel, stipulate
7 and request that the Court revise the following deadlines in the Order Extending Dates as set forth
8 below:

	<u>CURRENT DATE</u>	<u>NEW DATE</u>
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20 To avoid prejudice to the Parties and to facilitate case management, GOOD CAUSE exists
21 to extend the deadlines in this action as described herein.

21 Dated: April 21, 2010

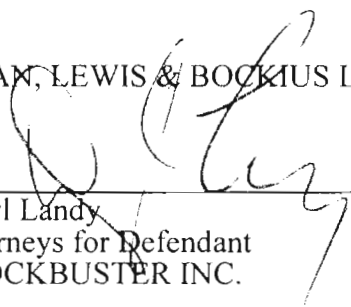
McINERNEY & JONES

By 
Charles Jones
Attorneys for Defendant
MELISSA S. CURRIE-WHITE

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Dated: April 29 2010

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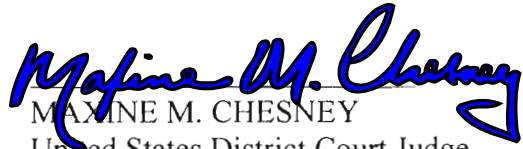
By 
Daryl Landy
Attorneys for Defendant
BLOCKBUSTER INC.

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that the dates indicated in the Court's Order Extending Pretrial Preparation Order Dates will be extended as reflected below:

- 1. Deadline to Amend Pleadings 6/18/10
- 2. Class Certification Filing Deadline: 6/25/10
 - A. Defendant's Opposition to Class Certification Motion: 8/24/10
 - B. Plaintiff's Reply in Support of Class Certification Motion: 9/23/10
 - C. Hearing on Class Certification Motion: 10/15/10
- 3. Non-Expert Discovery Cut-Off: 12/3/10

Dated: April 30, 2010


MAXINE M. CHESNEY
United States District Court Judge