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23 UNITED STATES DISTRICT COURT
 24 FOR THE NORTHERN DISTRICT OF CALIFORNIA

25 CRELENCIO CHAVEZ and JOSE
 26 ZALDIVAR, an individual and on behalf
 27 of all others similarly situated,

28 Plaintiffs,

vs.

LUMBER LIQUIDATORS, INC. a
 Delaware Corporation; and DOES 1
 through 20, inclusive,

Defendants.

Case No. C-09-04812 SC

STIPULATION AND [~~PROPOSED~~] ORDER
 REGARDING ORDER TO MEET AND
 CONFER AND SUBMIT JOINT DISCOVERY
 LETTER [DKT. NO. 139]

CARLOS ALVA, ET AL.

Plaintiff(s),

vs.

LUMBER LIQUIDATORS, INC.

Defendant(s).

No. C-12-4383 SC

STIPULATION AND [PROPOSED] ORDER
 REGARDING ORDER TO MEET AND
 CONFER AND SUBMIT JOINT DISCOVERY
 LETTER [DKT. NO. 139]

1 Pursuant to the Court's Order to Meet and Confer And Submit Joint Discovery Letter
2 (Dkt. No. 139), Plaintiffs Crelencio Chavez, Carlos Alva, Andrew Owens, Joel Villasenor, and
3 Jason McMillan ("Plaintiffs") and Defendant (collectively, the "Parties"), by and through their
4 respective counsel of record, hereby timely respond to the Court's Order and submit the following
5 stipulation regarding discovery in the above-captioned matters:

6 WHEREAS, on July 8 and July 11, 2014, the Parties met and conferred by telephone in
7 compliance with the Court's Order and agreed to the following actions, which will occur on the
8 following deadlines:

9 **July 18, 2014**: Plaintiffs will subpoena their bank records and debit and credit card
10 statements for the respective time period(s) during which they were employed with Defendant
11 and will serve Defendant with the records, marked confidential subject to a meet and confer
12 between the Parties, immediately upon receipt.

13 **July 18, 2014**: Plaintiff Owens will provide Defendant with several possible non-
14 weekend, non-holiday dates before August 18 on which he is available for deposition.

15 **July 21, 2014**: Each Plaintiff will provide Defendant with a signed Authorization for
16 Release of Cell Phone Records to effectuate the release of telephone records. Any cell phone
17 records produced in discovery will be marked confidential subject to a meet and confer between
18 the Parties.

19 **July 24, 2014**: Each Plaintiff will serve substantive responses to Defendant's Request for
20 Production of Documents and Interrogatories that comply with the Northern District's Civil Local
21 Rules.

22 **July 25, 2014**: Each Plaintiff will produce any and all documents that are responsive to
23 the Request for Production of Documents (except to the extent the Parties have reached a
24 different agreement regarding the timing of production for cell phone records, bank records and
25 credit and debit card statements, *see supra*);

26 **August 4, 2014**: Plaintiff McMillan will appear for deposition at the law office of
27 Morgan Lewis in Los Angeles;

28 **August 18, 2014**: Plaintiffs Villasenor and Alva Plaintiffs will appear for a second day of

