



1 All parties to this action enter into the following stipulation based on the following facts:

2 The parties previously agreed to participate in Mediation pursuant to ADR L.R. 6.

3 The current Mediation Completion Deadline of March 18, 2011, was set by this Court's  
4 Scheduling Order (Dkt. No. 33) of May 14, 2010.

5 The parties have been meeting and conferring to resolve discovery disputes. As a result,  
6 the discovery and motion deadlines in this case have previously been continued by stipulated  
7 order on October 7, 2010 (Dkt. No. 35) and November 12, 2010 (Dkt. No. 44).

8 On March 3, 2011, counsel met in person and conferred on a number of discovery  
9 disputes. On March 8, 2011, defendants sent to plaintiffs a draft stipulation intended to set forth  
10 the agreements made during the meeting and conferring of March 3, 2011.

11 The parties are determined to engage in a productive mediation session in an effort to  
12 resolve this matter without the need for further, protracted litigation.

13 In order to do so, the parties require additional time to complete the discovery about  
14 which they met and conferred.

15 The parties believe an extension of the Mediation Completion Deadline is necessary and  
16 appropriate, and will cause no prejudice.

17 Therefore, THE PARTIES HEREBY STIPULATE and request that the Court order the  
18 Scheduling Order (Dkt. No. 33) modified to state that the Mediation Completion Deadline is  
19 extended to June 30, 2011, or such other date as the Court deems appropriate.

20 SO STIPULATED.

21 In compliance with General Order No. 45 (X), as filing party, Plaintiffs attest that all  
22 signatories below concur in the filing of this document.

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DATED: March 11, 2011

MAYER BROWN LLP  
JOHN NADOLENCO  
JEROME JAUFFRET  
KRISTEN ROWSE

By: /s/ Kristen Rowse  
Kristen Rowse  
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SARA LEE CORPORATION, SARA LEE  
BAKERY GROUP and EARTHGRAINS  
BAKING COMPANIES, INC.

DATED: March 11, 2011

SPIRO MOSS LLP

By: /s/ Ira Spiro  
Ira Spiro  
Attorneys for Plaintiffs

**~~[PROPOSED]~~ ORDER**

Good cause appearing, the Scheduling Order is Modified such that the Mediation Completion  
Date is changed to June 30, 2011.

DATED: March 15, 2011

  
MAXINE M. CHESNEY  
United States District Judge