| J | Case3:11-cv-00844-CRB Document23 F | iled08/23/11 Page1 of 4 | | | | |
|---------------------------------|--|--|--|--|--|--|
| 1 2 3 4 5 6 7 | DAVID F. MCDOWELL (CA SBN 125806) DMcDowell@mofo.com MORRISON & FOERSTER LLP 555 West Fifth Street, Suite 3500 Los Angeles, California 90013 Telephone: 213.892.5200 Facsimile: 213.892.5454 TIFFANY CHEUNG (CA SBN 211497) TCheung@mofo.com MORRISON & FOERSTER LLP 425 Market Street San Francisco, California 94105-2482 | | | | | |
| 8 | Telephone: 415.268.7000 Facsimile: 415.268.7522 | | | | | |
| 9 10 | Attorneys for Defendant TARGET CORPORATION | | | | | |
| 11 | UNITED STATES DIS | | | | | |
| 12 | NORTHERN DISTRICT OF CALIFORNIA | | | | | |
| 13 | SAN FRANCISCO DIVISION | | | | | |
| 14 15 | MELISSA ARECHIGA, individually and on behalf of all others similarly situated, | Case No. 3:11-cv-00844-CRB | | | | |
| 16 | Plaintiff, | | | | | |
| 17 | v. | JOINT STIPULATION AND | | | | |
| 18 | TARGET CORPORATION, and DOES 1 through | CONTINUE CASE MANAGEMENT CONFERENCE | | | | |
| 19 | 50, inclusive, | Hon. Charles R. Breyer | | | | |
| 20 | Defendants. | | | | | |
| 21 | this document relates to related cases: C-11-1274CRB, Akel v Target | | | | | |
| 22 | C-11-2208CRB, Brown v Target | | | | | |
| 23 | | | | | | |
| 24 | | | | | | |
| 25 | | | | | | |
| 26 | | | | | | |
| 27 | | | | | | |
| 28 | | | | | | |
| | JOINT STIP. AND [PROPOSED] ORDER TO CONTINUE CASE MAN 11-CV-00844-CRB sf-3035998 | AGEMENT CONFERENCE | | | | |

| | Case3:11-cv-00844-CRB Document23 Filed08/23/11 Page2 of 4 | | | | | |
|----|--|--|--|--|--|--|
| 1 | WHEREAS, Plaintiffs filed the above Complaints in these related actions during the time | | | | | |
| 2 | period of February through April 2011; | | | | | |
| 3 | WHEREAS, two actions against Target Corporation ("Target") related to those identified | | | | | |
| 4 | above have been voluntarily dismissed; | | | | | |
| 5 | WHEREAS, the case management conference for the remaining related cases is currently | | | | | |
| 6 | set for September 2, 2011; | | | | | |
| 7 | WHEREAS, the parties have been conferring on issues regarding their claims and | | | | | |
| 8 | defenses and are continuing to confer about these issues; | | | | | |
| 9 | WHEREAS, the parties have informally exchanged information and documents and | | | | | |
| 10 | require additional time to complete this informal process; | | | | | |
| 11 | WHEREAS, the parties agree that they may be able to fully resolve these cases through | | | | | |
| 12 | this process. | | | | | |
| 13 | The parties hereby stipulate and respectfully request that the Court continue the Case | | | | | |
| 14 | Management Conference until September 23, 2011 or a date thereafter that is convenient for the | | | | | |
| 15 | Court. The parties will file their joint case management statement at least seven days before the | | | | | |
| 16 | scheduled Case Management Conference. | | | | | |
| 17 | | | | | | |
| 18 | | | | | | |
| 19 | | | | | | |
| 20 | | | | | | |
| 21 | | | | | | |
| 22 | | | | | | |
| 23 | | | | | | |
| 24 | | | | | | |
| 25 | | | | | | |
| 26 | | | | | | |
| 27 | | | | | | |
| 28 | | | | | | |
| | JOINT STIP. AND [PROPOSED] ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE 2 11-CV-00844-CRB sf-3035998 | | | | | |

| | Case3:11-cv-00844-CRB | Document23 | Filed08/23/11 | Page3 of 4 |
|--------|--|------------------|--------------------------------|---------------------|
| | | | | |
| 1 | Dated: August 23, 2011 | HOI | FFMAN & LAZE | AR |
| 2 | | D | /a/ Chad A Ca | un de m |
| 3 | | By: | /s/ Chad A. Sa CHAD A. SAU | |
| 4 5 | | | Attorneys for I MELISSA AR | Plaintiff ECHIGA |
| 6 | | | | |
| 7 | Dated: August 23, 2011 | AIN | IAN-SMITH & M | ARCY |
| 8 | | | | |
| 9 | | By: | /s/ Hallie Von HALLIE VON | |
| 10 | | | Attorneys for H | Plaintiff |
| 11 | | | MICHELLE B | ROWN |
| 12 | Dated: August 23, 2011 | РАТ | TERSON LAW (| GROUP |
| 13 | | | | |
| 14 | | By: | /s/ James R. Pa | |
| 15 | | | JAMES R. PA | |
| 16 | | | Attorneys for F EYAD O. AKI | Plaintiff EL |
| 17 | | | | |
| 18 | | | | |
| 19 | | | | |
| 20 | | | | |
| 21 | | | | |
| 22 | | | | |
| 23 | | | | |
| 24 | | | | |
| 25 | | | | |
| 26 | | | | |
| 27 | | | | |
| 28 | JOINT STIP. AND [PROPOSED] ORDER TO 11-CV-00844-CRB sf-3035998 | OCONTINUE CASE M | ANAGEMENT CONFER | ENCE |

3

| | Case3:11-cv-00844-CRB Document23 Filed08/23/11 Page4 of 4 | | | | | |
|----------|---|--|--|--|--|--|
| 1 | .Dated: August 23, 2011 MORRISON & FOERSTER LLP | | | | | |
| 3 | By: /s/ Tiffany Cheung | | | | | |
| 4 | TIFFANY CHEUNG | | | | | |
| 5 | Attorneys for Defendant TARGET CORPORATION | | | | | |
| 6 | | | | | | |
| 7 | | | | | | |
| 8 | ECF ATTESTATION | | | | | |
| 9 | I, Tiffany Cheung, am the ECF User whose ID and Password are being used to file this: | | | | | |
| 10 | JOINT STIPULATION AND [PROPOSED] ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE | | | | | |
| 11 | In compliance with General Order 45, X.B., I hereby attest that Chad A. Saunders, Hallie | | | | | |
| 12 | Von Rock, and James R. Patterson concurred in this filing. | | | | | |
| 13 | Dated: August 23, 2011 MORRISON & FOERSTER LLP | | | | | |
| 14 | | | | | | |
| 15 | By: /s/ Tiffany Cheung | | | | | |
| 16 | Tiffany Cheung | | | | | |
| 17 | | | | | | |
| 18 | | | | | | |
| 19 | | | | | | |
| 20 | | | | | | |
| 21 | IT IS SO ORDERED. | | | | | |
| 22 | DATED: August 24, 2011 By: | | | | | |
| 23 | Judge Charles R. Breyer | | | | | |
| 24 25 | TT IS SO ORDERED | | | | | |
| 25 26 | | | | | | |
| 27 | Z Judge Charles R. Breyer | | | | | |
| 28 | | | | | | |
| | JOINT STIP. AND [PROPOSED] ORDER TO CONTINUE CASE MANAGEMENT CONTRENCE CT OF 11-CV-00844-CRB sf-3035998 | | | | | |