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Attorneys for Defendant  
GROUPON, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

SARAH GOSLING, on Behalf of Herself  
and All Other Similarly Situated and the  
General Public,

Plaintiff,

v.

GROUPON, INC., and DOES 1 through  
100, inclusive,

Defendants.

CASE NO. 3:11-cv-01038 (CRB)

**STIPULATION AND [PROPOSED]  
ORDER FOR CONTINUANCE OF CASE  
MANAGEMENT CONFERENCE AND  
RELATED DATES**

Case Management Conference:

Date: June 17, 2011  
Time: 8:30 a.m.  
Courtroom: 8  
Judge: Hon. Charles R. Breyer

1 Plaintiff Sarah Gosling ("Plaintiff") and Defendant Groupon, Inc. ("Groupon") by and  
2 through their respective attorneys of record, stipulate as follows:

3 1. The initial Case Management Conference in this action is set for June 17, 2011 at  
4 8:30 a.m.

5 2. Pursuant to the Order Setting Initial Case Management Conference and the Clerk's  
6 Notice dated March 14, 2011, the deadline to file the Rule 26(f) Report, complete initial  
7 disclosures or state objections to initial disclosures in the Rule 26(f) Report, and file the Case  
8 Management Conference Statement is June 10, 2011, and the deadline for the parties to meet and  
9 confer pursuant to Rule 26(f), file the ADR Certification, and file either a stipulation to ADR  
10 Process or Notice of Need for ADR Phone Conference is May 24, 2011.

11 3. On May 16, 2011, the Judicial Panel on Multidistrict Litigation ("JPML") will  
12 hear a motion to consolidate this case, along with other cases pending against Groupon  
13 and certain "retailer" defendants in various district courts and involving similar allegations  
14 ("MDL Motion").

15 4. The parties have previously stipulated and agreed to extend Groupon's time to  
16 respond to the complaint until (i) 45 days after the filing of a Consolidated Amended Complaint  
17 or whatever other deadline is set by the transferee court, in the event the JPML grants the MDL  
18 Motion, or (ii) 45 days after service of the JPML's decision on the MDL Motion to consolidate or  
19 whatever deadline is set by this Court, in the event the JPML denies the MDL Motion to  
20 consolidate.

21 5. In light of the above, the parties hereby stipulate and request that the Court stay all  
22 currently pending dates and deadlines in this matter, including the Case Management Conference  
23 currently scheduled for June 17, 2011 at 8:30 a.m., pending the JPML's decision on the MDL  
24 Motion. The parties further request that in the event the JPML denies the MDL Motion, the

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1 Court reset the Case Management Conference for a date no sooner than 45 days after service of  
2 the JPML's decision on the MDL Motion.

3 **IT IS SO STIPULATED.**

4  
5 Dated: April 28, 2011

DLA PIPER LLP (US)

7 By s/ Christopher M. Young  
8 SHIRLI F. WEISS  
9 PAUL J. HALL  
10 CHRISTOPHER M. YOUNG  
11 NOAH A. KATSELL  
12 Attorneys for Defendant  
13 GROUPON, INC.

14  
15 Dated: April 28, 2011

ROBBINS GELLER RUDMAN & DOWD LLP

17 By s/ John J. Stoia, Jr.  
18 JOHN J. STOIA, JR.  
19 RACHEL L. JENSEN  
20 PHONG L. TRAN  
21 Attorneys for Plaintiff  
22 SARAH GOSLING

23  
24 I, Christopher M. Young, attest that concurrence in the filing of this document has been  
25 obtained from each of the signatories. I declare under penalty of perjury under the laws of the  
26 United States of America that the foregoing is true and correct. Executed on this 28th day of  
27 April, 2011 at San Diego, California.

28 By: s/ Christopher M. Young  
CHRISTOPHER M. YOUNG  
Attorney for Defendant Groupon, Inc.

**ORDER**

PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that all dates and deadlines in this matter are stayed pending the decision of the Judicial Panel on Multidistrict Litigation (“JPML”) on the MDL Motion to consolidate. The Case Management Conference currently scheduled for June 17, 2011 at 8:30 a.m. is taken off calendar, and shall be rescheduled for a date no sooner than 45 days after service of the JPML’s decision on the MDL Motion, in the event the JPML denies the MDL Motion.

IT IS SO ORDERED.

Dated: April \_\_, 2011

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The Hon. Charles R. Breyer  
U.S. District Court Judge