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7 Attorneys for Defendant
 8 SAFEWAY INC.

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 OAKLAND DIVISION

12 DEE HENSLEY-MACLEAN, and
 13 JENNIFER ROSEN, on behalf of themselves
 and all others similarly situated,
 14 Plaintiffs,
 15 v.
 16 SAFEWAY, INC. and DOES ONE through
 TWENTY, inclusive
 17 Defendants.

CASE NO. C 11-01230
**STIPULATION AND ~~PROPOSED~~ ORDER
 ENLARGING TIME TO FILE BRIEFS**
[CIVIL LOCAL RULES 6-1, 6-2, AND 7-12]

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1 WHEREAS, defendant Safeway Inc. (“Safeway”) removed this case from the Superior
2 Court of the State of California for the County of Alameda to this Court on March 14, 2011;

3 WHEREAS, pursuant to Local Rule 6-1(a), the parties to this proceeding have previously
4 stipulated to enlarge the time for Safeway to answer or otherwise respond to plaintiffs’ complaint
5 to April 4, 2011; and

6 WHEREAS, plaintiffs have requested an extension of the briefing schedule if a motion
7 challenging the complaint is filed by Safeway and Safeway so consents;

8 WHEREAS, pursuant to Civil Local Rule 6-2(a), counsel for Safeway is concurrently
9 filing a declaration in support of this Stipulation and [Proposed] Order;

10 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the undersigned
11 counsel for the parties as follows:

- 12 1. Plaintiffs will file any opposition to a motion challenging the complaint on May 9,
13 2011;
- 14 2. Safeway will file any reply to plaintiffs’ opposition brief on May 23, 2011; and
- 15 3. Safeway will notice any motion challenging the complaint for a hearing during
16 the week of June 6, 2011, or the Court’s next available date for law and motion.

17 **IT IS SO STIPULATED AND AGREED.**

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19 Authority for and concurrence in the filing of this stipulation has been obtained
20 from each of the signatories, pursuant to General Order 45 X.B.

21 Dated: March 21, 2011

Respectfully submitted,

LATHAM & WATKINS LLP
Stephen Stublarec
Belinda S Lee
Betsy A. Williams

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25 By _____ /s/ BELINDA S LEE
26 Belinda S Lee
27 Attorneys for Defendant
28 SAFEWAY INC.

