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6 Attorneys for Defendant
 BED BATH & BEYOND INC.

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

12 BONNIE POLIGRATES, on behalf of herself and
 all others similarly situated,

13 Plaintiff,

14 v.

15 BED, BATH & BEYOND, INC., and Does 1
 16 through 100, inclusive,

17 Defendants.

Case No. 3:11-cv-01661-EMC

**STIPULATION TO EXTEND
 DEFENDANT BED BATH &
 BEYOND INC.'S TIME TO
 RESPOND TO COMPLAINT
 [L.R. 6-2]; DECLARATION OF
 PURVI G. PATEL; PROPOSED
 ORDER**

Hon. Edward M. Chen

Complaint Filed: March 4, 2011

1 **STIPULATION**

2 Pursuant to Rule 6-2 of the Local Rules of the United States District Court for the
3 Northern District of California, Plaintiff Bonnie Poligrates (“Plaintiff”) and Defendant Bed Bath
4 & Beyond Inc. (“BBB”), by and through their undersigned counsel, stipulate as follows:

5 WHEREAS, Plaintiff filed the Complaint in this action on March 4, 2011, and served
6 BBB with the Complaint on or about March 8, 2011;

7 WHEREAS, BBB filed a Notice of Removal to remove the action to this Court on April 6,
8 2011;

9 WHEREAS, pursuant to the parties’ Stipulation to Extend Defendant’s Time to Respond
10 to Complaint [L.R. 6-1(a)] [Doc. No. 8] and this Court’s Order granting the parties’ stipulation
11 [Doc. No. 9], BBB’s deadline to answer or otherwise respond to the Complaint is May 3, 2011;

12 WHEREAS, the parties are continuing to meet and confer regarding the factual bases of
13 Plaintiff’s claims, and are currently exchanging, on an informal basis, records pertaining to the
14 alleged transactions that form the basis of Plaintiff’s Complaint;

15 WHEREAS, good cause exists for an extension of BBB’s deadline to respond to the
16 Complaint because BBB requires additional time to investigate Plaintiff’s allegations and prepare
17 its response to the Complaint;

18 WHEREAS, the parties have agreed that the deadline for BBB to answer or otherwise
19 respond to the Complaint shall be extended by seventeen (17) days, to and including May 20,
20 2011; and

21 THEREFORE, IT IS HEREBY AGREED AND STIPULATED that BBB shall have to
22 and including May 20, 2011, to answer or otherwise respond to the Complaint.
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Dated: May 2, 2011

DAVID F. MCDOWELL
PURVI G. PATEL
MORRISON & FOERSTER LLP

By: /s/ Purvi G. Patel
Purvi G. Patel

*Attorneys for Defendant
Bed Bath & Beyond Inc.*

Dated: May 2, 2011

DANIEL H. QUALLS
ROBIN G. WORKMAN
AVIVA N. ROLLER
QUALLS & WORKMAN, L.L.P.

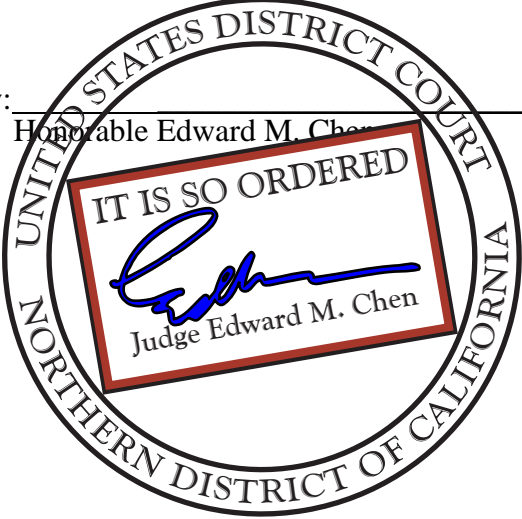
By: /s/ Daniel H. Qualls
Daniel H. Qualls

*Attorneys for Plaintiff
Bonnie Poligrates, on behalf of herself
and all others similarly situated*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

May 3, 2011
Dated: _____

By: _____
Honorable Edward M. Chen



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DECLARATION OF PURVI G. PATEL

I, Purvi G. Patel, hereby declare as follows:

1. I am an attorney admitted to practice law in the courts of the State of California and am a member of the Bar of this Court. I am an associate at Morrison & Foerster LLP, counsel of record for Defendant Bed Bath & Beyond Inc. (“BBB”) in the above-captioned action. I make this declaration based on my personal knowledge.

2. I submit this declaration in support of the parties’ Stipulation to Extend Defendant Bed Bath & Beyond Inc.’s Time to Respond to Complaint [L.R. 6-2].

3. The parties previously stipulated to a twenty (20) day extension of BBB’s deadline to respond to the Complaint from April 13, 2011 to May 3, 2011. [Doc. No. 8.] That deadline to respond has been fixed by this Court’s Order granting the parties’ Stipulation to Extend Defendant’s Time to Respond to Complaint [L.R. 6-1(a)]. [Doc. No. 9.]

4. The parties are continuing to meet and confer regarding the factual bases of Plaintiff’s claims. The parties are currently exchanging, on an informal basis, records pertaining to the alleged transactions that form the basis of Plaintiff’s Complaint.

5. BBB requests the extension of time to investigate Plaintiff’s allegations and prepare its response to the Complaint.

6. The parties submit this stipulation to request that BBB’s deadline to respond to the Complaint, which has been fixed by Court order, be extended by seventeen (17) days to and including May 20, 2011. This extension of time will not affect any hearing or proceeding on the Court’s calendar and is not made for purposes of delay.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 2nd day of May, 2011, in Los Angeles, California.

/s/ Purvi G. Patel
Purvi G. Patel

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ECF ATTESTATION

I, Purvi G. Patel, am the ECF User whose ID and password are being used to file this **STIPULATION TO EXTEND DEFENDANT BED BATH & BEYOND INC.'S TIME TO RESPOND TO COMPLAINT [L.R. 6-2]; DECLARATION OF PURVI G. PATEL; PROPOSED ORDER.** In accordance with General Order 45 X.B, concurrence in the filing of this document has been obtained from Daniel H. Qualls and Robin G. Workman, counsel for Plaintiff, and I shall maintain records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request by a party.

Dated: May 2, 2011

DAVID F. MCDOWELL
PURVI G. PATEL
MORRISON & FOERSTER LLP

By: /s/ Purvi G. Patel
Purvi G. Patel

*Attorneys for Defendant
Bed Bath & Beyond Inc.*