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14 Attorneys for Defendant
 15 SAFEWAY INC.

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA
 18

19 MICHAEL RODMAN, on behalf of himself
 20 and all others similarly situated,

21 Plaintiff,

22 v.

23 SAFEWAY INC.,

24 Defendant.

Case No. 11-03003 JST (JCS)

**JOINT STIPULATION AND ~~PROPOSED~~
 ORDER REGARDING BRIEFING
 SCHEDULE FOR PLAINTIFF'S MOTION
 FOR SANCTIONS**

1 Plaintiff Michael Rodman on behalf of himself and the certified Class (“Plaintiff”) and
2 Defendant, Safeway Inc. (“Safeway”) stipulate as follows:

3 WHEREAS, the Court entered final judgment (Dkt. No. 406) in favor of Plaintiff for
4 breach of contract damages plus pre-judgment interest and against Safeway Inc. (“Safeway”);

5 WHEREAS, Safeway filed a notice of appeal (Dkt. No. 408), which appeal is pending
6 before the United States Court of Appeals for the Ninth Circuit;

7 WHEREAS, Plaintiff filed a Motion for Sanctions on April 6, 2016 (Dkt. No. 434);

8 WHEREAS, Safeway’s opposition is currently due on May 4, 2016 and Plaintiff’s reply is
9 currently due on May 25, 2016 (Dkt. No. 432);

10 WHEREAS, the parties have agreed to a one week extension for each of their respective
11 deadlines; and

12 WHEREAS, the agreement leaves more than two weeks between Plaintiff’s reply and the
13 previously scheduled hearing date, which the parties are not seeking to change.

14
15 NOW, THEREFORE, the parties to the above-captioned action hereby stipulate and agree
16 that, subject to approval by the Court, the deadlines for Plaintiff’s Motion for Sanctions shall be
17 modified as follows:

Event	Current Date	Proposed New Date
Deadline for Safeway to respond	May 4, 2016	May 11, 2016
Plaintiff’s reply	May 25, 2016	June 4, 2016
Hearing on Plaintiff’s motion for sanctions	June 16, 2016	No change

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IT IS SO STIPULATED.

Dated: April 28, 2016

Dated: April 28, 2016

REED SMITH LLP

CHIMICLES & TIKELLIS LLP

By: /s/ James A. Daire*

By: /s/ Timothy N. Mathews

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MICHAEL RODMAN and the Class

* I, James A. Daire, am the ECF User whose identification and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Timothy N. Mathews have concurred in this filing.

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PROPOSED ORDER

Good cause appearing therefore, PURSUANT TO STIPULATION, IT IS ORDERED THAT the deadlines for Plaintiff's motion for sanctions are modified as follows:

Event	Current Date	Proposed New Date
Deadline for Safeway to respond	May 4, 2016	May 11, 2016
Plaintiff's reply	May 25, 2016	June 4, 2016 June 1, 2016
Hearing on Plaintiff's motion for sanctions	June 16, 2016	No change

IT IS SO ORDERED.

Date: April 28 2016

