

1 James C. Shah (SBN 260435)
 SHEPHERD, FINKELMAN, MILLER & SHAH, LLP
 2 401 West A Street, Suite 2350
 San Diego, CA 92101
 3 Telephone: (619) 235-2416
 jshah@sfmslaw.com

4 CHIMICLES & TIKELLIS LLP
 5 Steven A. Schwartz
 Timothy N. Mathews
 6 361 W. Lancaster Avenue
 Haverford, PA 19041
 7 Telephone: (610) 642-8500

8 Attorneys for Plaintiff and on Behalf
 of All Others Similarly Situated

9 Scott D. Baker (SBN 84923)
 10 Jonah D. Mitchell (SBN 203511)
 James A. Daire (SBN 239637)
 11 Christine M. Morgan (SBN 169350)
 12 REED SMITH LLP
 101 Second Street, Suite 1800
 13 San Francisco, CA 94105
 Telephone: (415) 543-8700

14 Attorneys for Defendant
 15 SAFEWAY INC.

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA
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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, by prior stipulation, the deadline for Safeway’s opposition was extended from
9 May 4, 2016 to May 11, 2016 and the deadline for Plaintiff’s reply was extended from May 25,
10 2016 to June 1, 2016 (Dkt. No. 438);

11 WHEREAS, the Court continued the hearing on Plaintiff’s Motion for Sanctions from June
12 16, 2016 to July 14, 2016 (Dkt. No. 439);

13 WHEREAS, the parties have agreed to a two day extension for each of their respective
14 deadlines; and

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:
18

Event	Current Date	Proposed New Date
Deadline for Safeway to respond	May 11, 2016	May 13, 2016
Plaintiff’s reply	June 1, 2016	June 3, 2016
Hearing on Plaintiff’s motion for sanctions	July 14, 2016	No change

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IT IS SO STIPULATED.

Dated: May 9, 2016

Dated: May 9, 2016

REED SMITH LLP

CHIMICLES & TIKELLIS LLP

By: /s/ Jonah D. Mitchell*
Scott D. Baker (SBN 84923)
Jonah D. Mitchell (SBN 203511)
James A. Daire (SBN 239637)
Christine M. Morgan (SBN 169350)
101 Second Street, Suite 1800
San Francisco, CA 94105
Telephone: (415) 543-8700
Facsimile: (415) 391-8269

Attorneys for Defendant
SAFEWAY INC.

By: /s/ Timothy N. Mathews
Steven A. Schwartz (pro hac vice)
Timothy N. Mathews (pro hac vice)
361 W. Lancaster Ave.
Haverford, PA 19041
Telephone: (610) 642-8500
Facsimile: (610) 649-3633

James C. Shah (SBN 260435)
Rose F. Luzon (SBN 221544)
SHEPHERD, FINKELMAN,
MILLER & SHAH
401 West A Street, Suite 2350
San Diego, CA 92101
Telephone: (619) 235-2416
Facsimile: (866) 300-7367

Attorneys for Plaintiff
MICHAEL RODMAN and the Class

* I, Jonah D. Mitchell, 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 11, 2016	May 13, 2016
Plaintiff's reply	June 1, 2016	June 3, 2016
Hearing on Plaintiff's motion for sanctions	July 14, 2016	No change

IT IS SO ORDERED.

Date: May 10, 2016

