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12
 13 UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 14

15 MATTHEW EDWARDS, et al.,
 16 Plaintiffs,
 17 v.
 18 NATIONAL MILK PRODUCERS
 FEDERATION, et al.
 19 Defendants.

CASE NO. 4:11-CV-4766 DMR

**STIPULATION AND [PROPOSED]
 ORDER EXTENDING TIME TO
 RESPOND TO COMPLAINT**

20
 21
 22 **Whereas**, on September 26, 2011, Matthew Edwards filed his Class Action Complaint for
 23 Violations of state antitrust statutes and the common law of unjust enrichment against the National
 24 Milk Producers Federation, aka Cooperative Working Together, the Dairy Farmers of America, Inc.,
 25 Land O' Lakes, Inc., Dairylea Cooperative Inc., and Agri-Mark, Inc.;

26 **Whereas** the National Milk Producers Federation was served with the Class Action
 27 Complaint on September 27, 2011;
 28

1 **Whereas** the parties have conferred and jointly move the Court for an extension of Defendant
2 National Milk Producers Federation’s (“NMPF”) time to answer or otherwise respond to Plaintiffs’
3 complaints in the following related actions: *Edwards, et al. v. National Federation of Milk*
4 *Producers, et al.*, Case No 4:10-cv-4766 (DMR) and *Robb, et al v. National Milk Producers*
5 *Federation, et al.*, Case No 3:11-cv-4791(JCS).
6

7 **Whereas** Counsel for plaintiffs have advised Counsel for Defendant NMPF that another
8 related action will be filed with this Court within the next two weeks; and the parties accordingly
9 believe that the interests of judicial economy and efficiency will be served if Defendant is permitted
10 to answer or otherwise respond collectively to all of the related complaints filed in this Court.
11

12 **Whereas** the parties believe that meeting and conferring regarding a discovery plan and other
13 case management issues would be more productive after Defendant has responded to the Complaint
14 and/or after any motion practice has been resolved; and the parties accordingly believe the case
15 management conference should be continued to a date on or after March 30, 2012, with the deadline
16 to meet and confer pursuant to Federal Rule of Civil Procedure 26(f) (and ADR process selection) set
17 for 21 days prior to the case management conference, and with the deadline for the parties’ Rule 26(f)
18 report, initial disclosures, and joint case management statement set for 10 days prior to the
19 conference.
20

21 Defendant and Plaintiffs, through their respective Counsel, **HEREBY STIPULATE AND**
22 **AGREE AS FOLLOWS:**

- 23 1. Defendant NMPF’s deadline to respond to Plaintiffs’ complaints in the *Edwards, et al. v.*
24 *National Federation of Milk Producers, et al.*, Case No 4:10-cv-4766 (DMR) and *Robb, et al*
25 *v. National Milk Producers Federation, et al.*, Case No 3:11-cv-4791(JCS) and forthcoming
26 related action: 21 days following service of last filed complaint, plus an additional 30 days.
27
28

- 1 2. Plaintiffs' opposition or response to Defendant NMPF's filing: 60 days after Defendants'
2 filing.
- 3 3. Defendant NMPF's reply to any opposition or response of Plaintiffs: 30 days after
4 Plaintiffs' filing.
- 5
6 4. The initial case management conference: on or after March 30, 2012, with the deadline to
7 meet and confer pursuant to Federal Rule of Civil Procedure 26(f) (and ADR process
8 selection) set for 21 days prior to the case management conference, and that deadline for the
9 parties' Rule 26(f) report, initial disclosures, and joint case management statement set for 10
10 days prior to the conference.

11
12 DATED: October 14, 2011

Respectfully submitted,

13 STEPTOE & JOHNSON LLP

14 By:/s/ Chong S. Park _____

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Attorneys for the Plaintiffs

I, Chong S. Park, attest that concurrence in the filing of this document has been obtained from each of the other signatories.

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Dated the 28 day of November, 2011


Magistrate Judge Donna M. Ryu