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18 UNITED STATES DISTRICT COURT  
19 FOR THE NORTHERN DISTRICT OF CALIFORNIA

20 JEFFREY ROBB, et al.,

21 Plaintiffs,

22 v.

23 NATIONAL MILK PRODUCERS  
24 FEDERATION, et al.

25 Defendants.

CASE NO. 3:11-CV-4791 JCS

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

26 **Whereas**, on September 26, 2011, Jeffrey Robb filed his Class Action Complaint for  
27 Violations of state antitrust statutes and the common law of unjust enrichment against the National  
28 Milk Producers Federation, aka Cooperative Working Together, the Dairy Farmers of America, Inc.,  
Land O' Lakes, Inc., Dairylea Cooperative Inc., and Agri-Mark, Inc.;

**Whereas** the National Milk Producers Federation was served with the Class Action  
Complaint on September 29, 2011;

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

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 4. The initial case management conference: on or after March 30, 2012, with the deadline to  
6 meet and confer pursuant to Federal Rule of Civil Procedure 26(f) (and ADR process  
7 selection) set for 21 days prior to the case management conference, and that deadline for the  
8 parties' Rule 26(f) report, initial disclosures, and joint case management statement set for 10  
9 days prior to the conference.  
10

11  
12 DATED: October 14, 2011

Respectfully submitted,

13  
14 STEPTOE & JOHNSON LLP

15 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 Joseph C. Spero