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

19 JEFFREY ROBB, et al.,  
 20 Plaintiffs,  
 21 v.  
 22 NATIONAL MILK PRODUCERS  
 FEDERATION, et al.  
 23 Defendants.

CASE NO. 4:11-CV-4791 JCS  
**STIPULATION AND [PROPOSED]  
 ORDER EXTENDING TIME TO  
 RESPOND TO COMPLAINT**

24  
 25  
 26 **Whereas**, on September 27, 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

1 Milk Producers Federation, aka Cooperative Working Together, the Dairy Farmers of America, Inc.,  
2 Land O' Lakes, Inc., Dairylea Cooperative Inc., and Agri-Mark, Inc.;

3       **Whereas** Agri-Mark, Inc. was served with the Class Action Complaint on September 29,  
4 2011;

5       **Whereas** the parties have conferred and jointly move the Court for an extension of Defendant  
6 Agri-Mark, Inc.'s ("AMI") time to answer or otherwise respond to Plaintiffs' complaints in the  
7 following related actions: *Edwards, et al. v. National Federation of Milk Producers, et al.*, Case No  
8 4:10-cv-4766 (DMR) and *Robb, et al v. National Milk Producers Federation, et al.*, Case No 3:11-cv-  
9 4791(JCS).  
10

11       **Whereas** Counsel for plaintiffs have advised counsel for Defendant AMI that another related  
12 action will be filed with this Court within the next two weeks; and the parties accordingly believe that  
13 the interests of judicial economy and efficiency will be served if Defendant is permitted to answer or  
14 otherwise respond collectively to all of the related complaints filed in this Court.  
15

16       **Whereas** the parties believe that meeting and conferring regarding a discovery plan and other  
17 case management issues would be more productive after Defendant has responded to the Complaint  
18 and/or after any motion practice has been resolved; and the parties accordingly believe the case  
19 management conference should be continued to a date on or after March 30, 2012, with the deadline  
20 to meet and confer pursuant to Federal Rule of Civil Procedure 26(f) (and ADR process selection) set  
21 for 21 days prior to the case management conference, and with the deadline for the parties' Rule 26(f)  
22 report, initial disclosures, and joint case management statement set for 10 days prior to the  
23 conference.  
24

25       Defendant and Plaintiffs, through their respective counsel, **HEREBY STIPULATE AND**  
26 **AGREE AS FOLLOWS:**  
27  
28

- 1 1. Defendant AMI's deadline to respond to Plaintiffs' complaints in the *Edwards, et al. v.*  
2 *National Federation of Milk Producers, et al.*, Case No 4:10-cv-4766 (DMR) and *Robb, et al*  
3 *v. National Milk Producers Federation, et al.*, Case No 3:11-cv-4791(JCS) and forthcoming  
4 related action: 21 days following service of last filed complaint, plus an additional 30 days.
- 5 2. Plaintiffs' opposition or response to Defendant AMI's filing: 60 days after Defendants'  
6 filing.
- 7 3. Defendant AMI's reply to any opposition or response of Plaintiffs: 30 days after Plaintiffs'  
8 filing.
- 9 4. The initial case management conference: on or after March 30, 2012, with the deadline to  
10 meet and confer pursuant to Federal Rule of Civil Procedure 26(f) (and ADR process  
11 selection) set for 21 days prior to the case management conference, and that deadline for the  
12 parties' Rule 26(f) report, initial disclosures, and joint case management statement set for 10  
13 days prior to the conference.

14 DATED: October 17, 2011

15 Respectfully submitted,

16 HAGENS BERMAN SOBOL SHAPIRO LLP

17 By: /s/ Elaine T. Byszewski

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Attorney for Defendant Agri-Mark, Inc.

I, Paula L. Blizzard, 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