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20
 21 UNITED STATES DISTRICT COURT
 22 FOR THE NORTHERN DISTRICT OF CALIFORNIA

23 BOYS AND GIRLS CLUB OF THE EAST
 VALLEY, et al.,
 24
 Plaintiffs,
 25
 v.
 26 NATIONAL MILK PRODUCERS
 FEDERATION, et al.
 27
 Defendants.
 28

CASE NO. 3:11-CV-05253-JSW
**STIPULATION AND [PROPOSED]
 ORDER EXTENDING TIME TO
 RESPOND TO COMPLAINT AND FOR
 CASE MANAGEMENT CONFERENCE**

1 WHEREAS on October 28, 2011, Boys and Girls Club of the East Valley, *et al.* filed a Class
2 Action Complaint for violations of state antitrust statutes and the common law of unjust enrichment
3 against the National Milk Producers Federation, aka Cooperative Working Together, the Dairy
4 Farmers of America, Inc., Land O' Lakes, Inc., Dairylea Cooperative Inc., and Agri-Mark, Inc.
5 (collectively "Defendants"), as an action related to the already pending *Edwards, et al. v. National*
6 *Federation of Milk Producers, et al.*, Case No 3:11-cv-4766 (JSW) and *Robb, et al v. National Milk*
7 *Producers Federation, et al.*, Case No 3:11-cv-4791(JSW), as contemplated by the stipulations of the
8 parties (Dkt. Nos. 12, 14, 18) and subsequent order of the Court (Dkt. No. 29) filed in *Edwards*¹ and
9 the stipulations of the parties (Dkt. Nos. 11, 13, 17) and subsequent order of the Court (Dkt. No. 28)
10 filed in *Robb*;²
11

12 WHEREAS the aforementioned stipulations and orders set a coordinated timeframe for
13 responding to the complaints and a case management conference;
14

15 WHEREAS in the interests of judicial economy and efficiency the parties wish those same
16 coordinated dates to govern this related action.

17 Defendants and Plaintiffs HEREBY STIPULATE AND AGREE AS FOLLOWS:

- 18 1. Defendants' deadline to respond to *Boys and Girls Club of the East Valley, et al. v.*
19 *National Federation of Milk Producers, et al.*, Case No 3:11-cv-5253: December 19, 2011.
- 20 2. Plaintiffs' opposition or response to Defendants' filing: February 17, 2012.
- 21 3. Defendants' reply to any opposition or response of Plaintiffs: March 19, 2012.

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24 _____
25 ¹ The Court entered an order effectuating the stipulation submitted with respect to Dairy Farmers of
26 America, Land O'Lakes, and Dairylea, but has not yet entered orders on the similar stipulations
submitted with respect to National Milk Producers Federation (DE 12) or Agri-Mark (DE 14) in
Edwards.

27 ² The Court entered an order effectuating the stipulation submitted with respect to Dairy Farmers of
28 America, Land O'Lakes, and Dairylea, but has not yet entered orders on the similar stipulations
submitted with respect to National Milk Producers Federation (DE 11) or Agri-Mark (DE 13) in
Robb.

1 4. The initial case management conference: April 6, 2012, at 1:30 p.m., with the deadline to
2 meet and confer pursuant to Federal Rule of Civil Procedure 26(f) (and ADR process
3 selection) set for 21 days prior to the case management conference, and that deadline for
4 the parties' Rule 26(f) report, initial disclosures, and joint case management statement set
5 for 10 days prior to the conference.
6

7 Respectfully submitted,

8 DATED: November 17, 2011

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9 By: /s/ Elaine T. Byszewski

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I, Elaine T. Byszewski, 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



The Honorable Jeffrey S. White