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 13
 14

15 **UNITED STATES DISTRICT COURT**
 16 **NORTHERN DISTRICT OF CALIFORNIA**

17
 18 RANDY BOYSEN, an individual, on his
 own behalf and on behalf of all others
 19 similarly situated,

20 Plaintiff,

21 v.

22 WALGREEN CO., an Illinois
 Corporation d.b.a. WALGREENS; and
 23 DOES 1-10, inclusive,

24 Defendants.
 25
 26
 27
 28

CASE NO. 11-cv-06262-SI

CLASS ACTION

**STIPULATION AND [~~PROPOSED~~]
 ORDER MODIFYING HEARING
 DATE AND BRIEFING DEADLINES
 ON DEFENDANT'S MOTION TO
 DISMISS AND MOTION TO STAY**

Current Hearing Date: June 15, 2012
 Proposed Hearing Date: July 20, 2012
 Time: 9:00 a.m.
 Courtroom 10, 19th Floor
 The Honorable Susan Illston

1 Pursuant to Local Rules 6-2 and 7-12, and for the reasons set forth in the
2 accompanying Declaration of Tina Wolfson, Plaintiff Randy Boysen (“Plaintiff”) and
3 Defendant Walgreen Co. (“Defendant”) hereby stipulate, and request that the Court
4 issue the [Proposed] Order below, to modify the hearing date and the briefing schedule
5 on Defendant’s Motion to Dismiss (Docket No. 14) and Motion to Stay (Docket No.
6 18) (collectively, the “Motions”), as follows:

- 7
- 8 • Plaintiff’s Oppositions to the Motions, currently due on May 21 (14 days
9 after service and filing per Local Rule 7-3), shall be due on **June 4, 2012**.
- 10
- 11 • Defendant’s Replies in Support of the Motions, currently due May 28 (7 days
12 after the Oppositions are filed and served), shall be due on **June 18, 2012**.
- 13
- 14 • The currently noticed hearing date on both Motions, of June 15, 2012, shall
15 be extended to **July 20, 2012**.
- 16

17 Dated: May 17, 2012

AHDOOT & WOLFSON, PC

18 /s/ Tina Wolfson
19 Tina Wolfson, Esq.
20 10850 Wilshire Blvd., Suite 370
21 Los Angeles, California 90024
Tel: 310-474-9111; Fax: 310-474-8585

22 Dated: May 17, 2012

**RAM, OLSON, CEREGHINO &
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28 *Attorneys for Plaintiff, Randy Boysen*

1 Dated: May 17, 2012

MORRISON & FOERSTER

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3 By: /s/ James Schurz
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9 Attorneys for Defendant,
10 WALGREEN CO.

11
12 PURSUANT TO STIPULATION, IT IS SO ORDERED.

13
14 5/18/12

15 By: 
16 The Honorable Susan Illston
17 U.S. District Court Judge

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22 **ATTESTATION OF FILER**

23
24 Pursuant to N.D. Cal. General Order No. 45 § X.B, the undersigned attests that
25 each of the above-named signatories concur in the filing of this Joint Motion.
26

27 By: /s/ Tina Wolfson
28 Tina Wolfson

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13 Attorneys for Plaintiff,
14 RANDY BOYSEN

15 **UNITED STATES DISTRICT COURT**
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17 RANDY BOYSEN, an individual, on his
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19 Plaintiff,

20 v.

21 WALGREEN CO., an Illinois
22 Corporation d.b.a. WALGREENS; and
DOES 1-10, inclusive,

23 Defendants.

CASE NO. 11-cv-06262-SI

CLASS ACTION

**DECLARATION OF TINA
WOLFSON IN SUPPORT OF
STIPULATION AND [PROPOSED]
ORDER MODIFYING HEARING
DATE AND BRIEFING DEADLINES
ON DEFENDANT'S MOTION TO
DISMISS AND MOTION TO STAY**

Hearing Date: June 15th, 2012

Time: 9:00 a.m.

Courtroom 10, 19th Floor

The Honorable Susan Illston

1 I, Tina Wolfson, declare as follows:

2 1. I am an attorney duly licensed to practice in all courts in the State of
3 California and the District of Columbia. Pursuant to Local Rule 6-2, I submit this
4 declaration in support of the concurrently filed Stipulation and [Proposed] Order
5 Modifying Hearing Date and Briefing Deadlines on Defendant's Motion to Dismiss
6 and Motion to Stay (the "Stipulation") in the above-captioned case. The matters stated
7 herein are true of my own knowledge or, where indicated, I am informed and believe
8 that they are true. If called upon as a witness, I could and would competently testify to
9 these facts.

10 2. My firm's and my co-counsel's firm's extremely busy work schedules at
11 this time, and the substantial work required to oppose Defendant's Motion to Dismiss
12 and Motion to Stay, make the originally scheduled briefing schedule and hearing date
13 on these motions unmanageable for Plaintiffs' counsel. Defendant's counsel,
14 meanwhile, is unavailable for another hearing date until July 20, 2012. Counsel for all
15 parties have met and conferred on these scheduling issues, and agree that this proposed
16 modification is fair and just under the circumstances.

17 3. There has been one previous time modification in this Action, by
18 stipulation, which Extended the Deadlines in the Court's Order Setting Initial Case
19 Management Conference and ADR Deadlines. (Docket No. 8.)

20 4. The extension requested in the current Stipulation will have no effect on
21 the schedule for this case, other than requested briefing extension itself.

22
23 I declare under the penalty of perjury on the 17th day of May, 2012, that the
24 foregoing is true and correct.

25
26 
27 Tina Wolfson
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