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 15 WALGREEN CO.

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

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

21 Plaintiff,

22 v.

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

25 Defendants.

CASE NO. 11-cv-06262-SI

CLASS ACTION

**STIPULATION AND [PROPOSED]  
 ORDER CONTINUING DEADLINE  
 FOR PLAINTIFF'S FILING OF ANY  
 AMENDED COMPLAINT**

Current Deadline: August 2, 2012  
 Proposed Deadline: August 16, 2012

The Honorable Susan Illston

1 Pursuant to Local Rule 6-2, and for the reasons set forth in the accompanying  
2 Declaration of Tina Wolfson, Plaintiff Randy Boysen (“Plaintiff”) and Defendant  
3 Walgreen Co. (“Defendant”) hereby stipulate and request that the Court issue the  
4 [Proposed] Order below, to continue the date by which Plaintiff must file any amended  
5 complaint in this action, from the current date of August 2, 2012 (per Docket No. 41),  
6 until **August 16, 2012**.

7  
8 Dated: August 2, 2012

**AHDOOT & WOLFSON, PC**

9 /s/ Tina Wolfson  
10 Tina Wolfson, Esq.  
11 10850 Wilshire Blvd., Suite 370  
12 Los Angeles, California 90024  
Tel: 310-474-9111; Fax: 310-474-8585

13 Dated: August 2, 2012

**RAM, OLSON, CEREGHINO &  
KOPCZYNSKI LLP**

14  
15 /s/ Michael F. Ram  
16 Michael F. Ram, Esq.  
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19 *Attorneys for Plaintiff, Randy Boysen*

20 Dated: August 2, 2012

**MORRISON & FOERSTER**


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26 Attorneys for Defendant,  
27 WALGREEN CO.  
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

8/6/12

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

**ATTESTATION OF FILER**

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

By:           /s/ Tina Wolfson            
Tina Wolfson

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13 Attorneys for Plaintiff,  
14 RANDY BOYSEN

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

17 RANDY BOYSEN, an individual, on his  
18 own behalf and on behalf of all others  
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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 CONTINUING DEADLINE  
FOR PLAINTIFF'S FILING OF ANY  
AMENDED COMPLAINT**

Current Deadline: August 2, 2012  
Proposed Deadline: August 16, 2012

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 Continuing Deadline for Plaintiff's Filing of any Amended Complaint (the  
6 "Stipulation") in the above-captioned case. The matters stated herein are true of my  
7 own knowledge or, where indicated, I am informed and believe that they are true. If  
8 called upon as a witness, I could and would competently testify to these facts.

9 2. The requested extension is necessary in light of my vacation schedule, as I  
10 was on vacation from July 19 through 23, and from July 28 through 31, 2012. The  
11 requested extension also is required for reasons that constitute matter protected by the  
12 attorney-client privilege and by the attorney work product doctrine.

13 3. There have been two previous time modifications in this Action by  
14 stipulation: the first extended the deadlines in the Court's Order Setting Initial Case  
15 Management Conference and ADR Deadlines (Docket No. 8); and the second  
16 modified the hearing date and briefing deadlines on Defendant's motion to dismiss and  
17 motion to stay.

18 4. The extension requested in the current Stipulation will have no effect on  
19 the schedule for this case, other than requested filing extension itself.

20  
21 I declare under the penalty of perjury on the 2nd day of August, 2012, that the  
22 foregoing is true and correct.

23  
24   
25 Tina Wolfson