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5 Attorneys for Defendant
 6 SAFEWAY INC.

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 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

11 LAWRENCE BRANDON, on behalf of
 12 himself and all others similarly situated,

13 Plaintiff,

14 v.

15 SAFEWAY INC., a Delaware corporation with
 16 its Principal Place of Business in Pleasanton,
 17 California.

18 Defendant.

Case No.: C 11-06614 SI

**STIPULATION AND [PROPOSED]
 ORDER EXTENDING DEADLINES RE:
 DEFENDANT’S MOTION FOR
 SUMMARY JUDGMENT**

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1 WHEREAS, at the Initial Case Management Conference (“CMC”) held in this action on
2 April 6, 2012, the Court set a schedule for Defendant Safeway Inc.’s Motion for Summary
3 Judgment (“Motion”), as set forth in the Civil Pretrial Minutes issued on April 11, 2012 (Dkt. No.
4 21).

5 WHEREAS, the parties previously stipulated to, and the Court ordered, an extended briefing
6 schedule, as set forth in the Stipulation and Order Extending Deadlines Re: Defendant’s Motion For
7 Summary Judgment, issued on May 22, 2012 (Dkt. No. 25);

8 WHEREAS, Plaintiff and Defendant jointly agree that a short continuance of 15 days to file
9 the Motion would allow the parties an opportunity to focus on completing an in progress effort
10 aimed at settling the matter;

11 WHEREAS, the Parties have stipulated to a modified briefing schedule; and

12 WHEREAS, the agreed-upon schedule is not for the purpose of delay, promotes judicial
13 efficiency and will not cause prejudice to any party;

14 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties, through their
15 respective counsel, subject to approval of the Court as follows:

16 1. The deadline by which Defendant must file the Motion is hereby extended up to and
17 including December 21, 2012;

18 2. The deadline for Plaintiff’s opposition to the Motion is hereby extended up to and
19 including February 18, 2012;

20 3. The deadline for Defendant’s reply to the Motion is extended up to and including
21 March 4, 2013;

22 4. The hearing on the Motion is hereby set for March 22, 2013, at 9:00 a.m., or as soon
23 thereafter as the Court’s schedule may allow;

24 5. The undersigned Parties jointly and respectfully request that the Court enter this
25 Stipulation as an Order.

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Dated: November 28, 2012

ARNOLD & PORTER LLP

By: /s/ Monty Agarwal*
Monty Agarwal
Attorneys for Defendant
SAFEWAY INC.

Dated: November 28, 2012

FINKELSTEIN THOMPSON LLP

By: /s/ Rosemary Rivas
Rosemary Rivas
Attorneys for Plaintiff

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 11/30/12



Hon. Susan Illston
United States District Judge

* I hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories.