Hunton & Williams LLP 550 South Hope Street, Suite 2000 Los Angeles, California 90071-2627	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	NORTHERN DISTR MEE YONG LIM, individually and on behalf of others similarly situated, Plaintiffs, v. ZEP INC., Defendant.	y situated T IS SO ORDERED Judge James Ware JUSTRICT OF CALIFORNIA CASE NO. CV-12-00601 JW CLASS ACTION [Hon. James Ware] STIPULATION AND [PROPOSED] ORDER EXTENDING ADR DEADLINE
			Case No. CV 12-00601 JW Dockets.Justia.com

Plaintiff Mee Yong Lim ("Plaintiff") and Defendant Zep Inc. ("Zep") (collectively, "the parties"), if permitted by the Court, hereby stipulate to extend the deadline to hold an ADR session that is currently set for October 19, 2012 to November 30, 2012. In support of this stipulation to extend the ADR session deadline, the parties declare as follows:

Pursuant to the stipulation of the parties, on May 5, 2012, the Court 1. ordered the October 19, 2012 deadline to conduct private ADR in this matter.

2. The parties have been cooperating to select a mediator that is mutually acceptable to the parties and have selected Judge Edward Infante from JAMS in San Francisco.

3. The parties believe that Judge Infante will serve as the appropriate mediator due to his experience mediating complex cases and because of his experience as former Chief Magistrate Judge for the Northern District of California. Judge Infante also has extensive experience mediating class action disputes, including consumer class action disputes.

4. The instant matter involves a consumer class-action complaint, which involves claims under the California Consumers Legal Remedies Act, False Advertising Law, and Unfair Competition Law. Plaintiff's Amended Complaint also seeks injunctive relief.

Due to the nature of the claims, the parties believe that Judge Infante will 5. serve as the appropriate mediator who can best facilitate a meaningful ADR session.

6. The parties have been advised by JAMS that Judge Infante does not have an open mediation appointment prior to the current mediation deadline of October 19, 2012. The parties have been informed, however, that Judge Infante has availability in November.

1

2

3

4

5

6

7

8

9

10

13

15

7. The parties, therefore, necessitate a brief extension to the current ADR deadline of October 19, 2012 to November 30, 2012 so that they may schedule and confirm a mediation appointment with Judge Infante.

8. There have been no previous modifications of time in this case. This deadline extension will not affect other deadlines, such as the close of discovery, the last day for hearing dispositive motions, and the date of the preliminary pretrial conference, set by the Court.

The parties respectfully request that the Court enter the Proposed Order for the reasons set forth above.

Respectfully Submitted,

DATED: August 28, 2012

DATED: August 28, 2012

HUNTON & WILLIAMS LLP

By: /s/ Belynda B. Reck Belynda B. Reck Attorney for Defendant ZEP INC

REESE RICHMAN, LLP

By: /s/ Michael R. Reese Michael R. Reese Attorney for Plaintiff MEE YONG LIM and Proposed Class

*Filer attests that concurrence in the filing has been obtained from Mr. Reese.

550 South Hope Street, Suite 2000 Los Angeles, California 90071-2627 Hunton & Williams LLP 12 13 14 15 16

1

2

3

4

5

6

7

8

9

10

11

17

18

19

20

21

22

23

24

25

26

27

28

///

///

///

///

///

///

Hunton & Williams LLP

ORDER

Having read the stipulation of the parties, and good cause appearing therefore, the deadline to hold an ADR session is continued from October 19, 2012 to November 30, 2012.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: August 29, 2012

James Ware nited States District Court Chief Judge

Case No. CV 12-00601 JW