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 6 Attorneys for Defendants SIOUX HONEY
 ASSOCIATION, COOPERATIVE, an Iowa
 Entity,
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 9 **UNITED STATES DISTRICT COURT**
 10 **NORTHERN DISTRICT OF CALIFORNIA**
 11 **SAN FRANCISCO DIVISION**

<p>12 SORAYA ROSS, individually and on behalf of) all others similarly situated,) 13) Plaintiff,) 14) vs.) 15) SIOUX HONEY ASSOCIATION,) 16 COOPERATIVE, an Iowa Entity,) 17) Defendants.)</p>	<p>Case No.: CV 12 1645 EMC STIPULATION FOR LEAVE TO FILE AN AMENDED COMPLAINT AND EXTENDING TIME FOR SIOUX HONEY ASSOCIATION, COOPERATIVE TO FILE A RESPONSIVE PLEADING ; ORDER Hon. Edward M. Chen Complaint Filed: April 2, 2012</p>
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 20 **Whereas**, plaintiff Soraya Ross sent defendant Sioux Honey Association, Cooperative
 21 (“SHA”) a notice and demand letter pursuant to the California Consumers Legal Remedies Act
 22 (“CLRA”), Civil Code section 1782(a)(2) on June 11, 2012, demanding that SHA correct alleged
 23 violations identified in plaintiff’s complaint within 30 days, or plaintiff would amend her
 24 complaint to allege claims for actual, punitive and all other monetary damages permitted by the
 25 CLRA;

26 **Whereas**, SHA denies any alleged violations identified in plaintiff’s complaint and filed
 27 a motion to dismiss plaintiff’s complaint on June 11, 2012;

1 **Whereas**, plaintiff filed an amended complaint on July 2, 2012, and will further amend
2 the complaint to allege claims for all other monetary damages permitted by the CLRA.

3 **WHEREFOR**, pursuant to the United States District Court for the Northern District of
4 California Local Rules, Rules 5-1, 6-2, and 7-12, Ross and SHA hereby stipulate to leave for
5 Ross to file an amended complaint alleging claims and a prayer for monetary damages under
6 CLRA on or before July 16, 2012, and stipulate that SHA shall have an extension of time to file
7 a responsive pleading in this action to July 30, 2012.

8 This stipulation for leave of court to file an amended complaint and an extension of time
9 for SHA to file a responsive pleading will not alter the date of any event or deadline already
10 fixed by Court order. There have been no previous time modifications in this case, whether by
11 stipulation or court order.

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13 IT IS SO STIPULATED

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15 DATED: July 9, 2012

HINSHAW & CULBERTSON LLP

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18 By: /s/ David I. Dalby
19 David I. Dalby
20 Attorneys for Defendants SIOUX HONEY
ASSOCIATION, COOPERATIVE, an Iowa
Entity,

21 Dated: July 9, 2012

KIESEL BOUCHER LARSON LLP

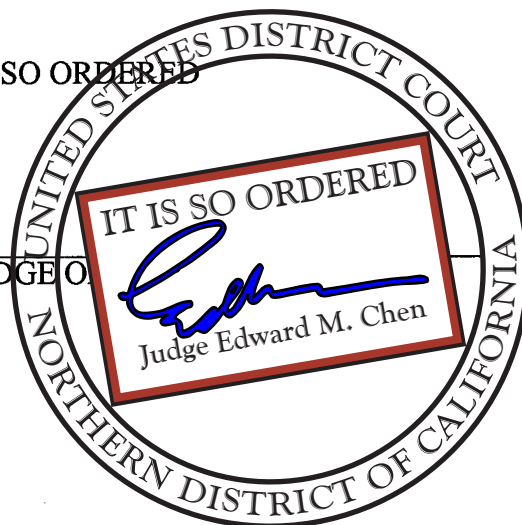
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24 /s/ Jeffrey A. Koncius
Attorneys for Plaintiff Soraya Ross

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PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: July 9, 2012

JUDGE O



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DECLARATION OF DAVID IAN DALBY

I, David Ian Dalby declare,

1. I am an attorney licensed to practice in the State of California and I am admitted to practice before this court. I represent Sioux Honey Association, Cooperative (“SHA”), in the above-captioned action. I have personal knowledge of the facts recited in this declaration and could competently testify thereto if called upon to do.

2. On behalf of SHA, I filed a motion to dismiss plaintiff’s complaint on June 11, 2012. On June 11, 2012, plaintiff’s attorneys sent me a thirty (30) day demand letter pursuant to the California Legal Remedies Act, (CLRA) Civil Code section 1782(a), demanding the SHA correct alleged violations identified in plaintiff’s complaint. SHA denies that such alleged violation exist to be corrected.

3. On July 2, 2012, plaintiff filed an amended class action complaint. Based on my conversations with plaintiff’s counsel, I understand that plaintiff will file a further amend the complaint to alleged claims for monetary damages under the CLRA. To avoid filing and refile responsive pleadings to Ross’s amended complaints that will not be substantively different in the facts alleged, the parties have stipulated that Ross may have leave to file the amended complaint by July 16, 2012, in accordance with the June 11, 2012 demand letter, and SHA shall have to July 30, 2012 to file a responsive pleading to the amended complaint.

5. This stipulation for leave of court to file an amended complaint and an extension of time for SHA to file a responsive pleading will not alter the date of any event or deadline already fixed by Court order. There have been no previous time modifications in this case, whether by stipulation or court order. There is a Case Management Conference scheduled in this case and the related *Brod v. Sioux Honey Association, Cooperative*, Case No. C 12-01322 EMC, scheduled for July 19, 2012 at 1:30 p.m.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: July 9, 2012

/s/ David Ian Dalby