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7 Attorneys for Plaintiff SORAYA ROSS, individually
 and on behalf of all others similarly situated

8
 9 **(Additional counsel listed on signature page)**

10 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
 11 **SAN FRANCISCO DIVISION**

| | |
|-------------------------------------------------|----------------------------------------|
| 12 SORAYA ROSS, individually and on behalf of) | Case No.: CV 12-1645 EMC |
| 13 all others similarly situated,) |) |
| 14 Plaintiff,) | STIPULATION CONCERNING |
| 15 vs.) | EXTENSION OF TIME FOR PLAINTIFF |
| 16) | ROSS TO FILE AN OPPOSITION TO |
| 17 SIOUX HONEY ASSOCIATION,) | DEFENDANT'S MOTION TO DISMISS |
| 18 COOPERATIVE, an Iowa Entity,) | AND [PROPOSED] ORDER |
| 19 Defendant.) |) |
| 20) | Judge: Hon. Edward M. Chen |
|) | Complaint Filed: April 2, 2012 |
|) |) |
|) |) |

21 **WHEREAS**, Plaintiff Ross's Opposition to Defendant's Motion to Dismiss Plaintiff's
 22 Second Amended Complaint is currently due to be filed on August 13, 2012;

23 **WHEREAS**, during the case management conference conducted by the Court on August
 24 10, 2012, Plaintiff's counsel informed the Court that Plaintiff Ross intended to request that
 25 Defendant stipulate to allowing Plaintiff to file and serve Plaintiff's Third Amended Class Action
 26 Complaint in order to address certain issues raised by Defendant's Motion to Dismiss relating to
 27 preemption and certain other issues;

28 **WHEREAS**, Defendant's counsel responded that it would evaluate Plaintiff's request

1 with Defendant and would promptly inform the Court and Plaintiff's counsel whether Defendant
2 was willing to stipulate to allowing Plaintiff Ross to file a Third Amended Class Action
3 Complaint;

4 **WHEREAS**, the parties mutually agree that they require a brief period of time for
5 Defendant to evaluate Plaintiff's request and to meet and confer further after Defendant has
6 considered Plaintiff's proposed Third Amended Class Action Complaint;

7 **IT IS HEREBY STIPULATED AND ORDERED THAT:**

8 1. Plaintiff's deadline to file Plaintiff's Opposition to Defendant's Motion to Dismiss is
9 hereby extended from August 13, 2012 to August 20, 2012 and the deadline to file Defendant's
10 Reply in support of the Motion to Dismiss is hereby extended from August 20, 2012 to August
11 27, 2012.

12 2. In the event that Defendant is willing to stipulate to allowing Plaintiff Ross to file a
13 Third Amended Class Action Complaint, Defendant shall promptly inform Plaintiff of
14 Defendant's willingness to do so and the parties shall jointly execute a stipulation reflecting such
15 agreement and file that Stipulation with the Court on August 20, 2012, along with Plaintiff's
16 Third Amended Complaint.

17 3. In the event Defendant is not willing to stipulate to allowing Plaintiff Ross to file a
18 Third Amended Class Action Complaint, Plaintiff shall file her: (i) Motion for Leave to File
19 Plaintiff's Third Amended Class Action Complaint along with Plaintiff's [Proposed] Third
20 Amended Class Action Complaint as an Exhibit thereto, and (ii) Plaintiff's Opposition To
21 Defendant's Motion to Dismiss for the Court's consideration on August 20, 2012.

22 DATED: August 13, 2012

KIESEL BOUCHER LARSON LLP

23 By: /s/ Paul R. Kiesel

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DATED: August 13, 2012

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PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: 8/14/12

