

1 GABRIEL ROJAS, as an individual, and on)
behalf of all others similarly situated,)
2 Plaintiff,)
3 v.)
4 GENERAL MILLS, INC.,)
5 Defendant.)

Case No. 3:12-cv-05099-WHO

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1 Plaintiffs Judith Janney, Amy McKendrick, Sean Bohac and Gabriel Rojas (“Plaintiffs”) and
2 Defendant General Mills, Inc. (“Defendant”) (collectively, the “Parties”), respectfully submit the
3 following discovery schedule for this Court’s consideration. The Parties hereby request that the
4 Court enter the following discovery schedule:

5 Factual Discovery cut-off	December 15, 2014 ¹
6 Plaintiffs’ Disclosure of Class Certification Experts 7 (and corresponding Reports)	July 1, 2014
8 Defendant’s Disclosure of Class Certification Experts 9 (and corresponding Reports)	August 1, 2014
10 Deposition of Class Certification Experts	September 1, 2014
11 Disclosure of Rebuttal Class Certification Experts 12 (and corresponding Reports)	October 31, 2014
13 Deposition of Rebuttal Class Certification Experts and Reports	November 12, 2014
14 Plaintiffs’ Motion for Class Certification	September 22, 2014
15 Defendant’s Opposition to Motion for Class Certification	October 17, 2014
16 Plaintiff’s Class Certification Reply	November 7, 2014

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¹ The Parties have agreed discovery will not be bifurcated and that merits discovery will proceed simultaneously with class certification discovery. Notwithstanding the December 15, 2014, discovery cutoff, the parties agree to meet and confer regarding the necessity of supplemental merits discovery, and the scope of such discovery, in light of the Court’s Order on Plaintiffs’ Motion for Class Certification. The parties agree to file a joint submission within 21 days of issuance of the Court’s Order on Plaintiffs’ Motion for Class Certification, and that any such discovery will be limited to a 90-day period.

25 The Parties will propose a separate schedule regarding discovery of non-class certification
26 experts who will testify at trial 45 days after the Court’s ruling on Plaintiffs’ Motion for Class
27 Certification.
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Parties' Supplemental Briefing Re: Rebuttal
Certification Experts (10-page limit)

November 19, 2014

Hearing on Motion for Class Certification

December 3, 2014

Pretrial Hearing
Trial

June 15, 2015

July

1 October 11, 2013

REESE RICHMAN LLP

2 /s/ Michael R. Reese
Michael R. Reese

3 - and -

4 Yvette Y. Golan
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7 *Counsel for Plaintiff Bohac and the Proposed Class*

8 October 11, 2013

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9 /s/ Michael R. Reese
Michael R. Reese

10 - and -

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17 *Counsel for Plaintiff Rojas and the Proposed Class*

18 October 11, 2013

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19 /s/ Charles Sipos
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24 *Counsel for Defendant General Mills, Inc.*

25 Pursuant to Stipulation, and modified to include a Pre-Trial Conference on June 16, 2015, it is
26 SO ORDERED.

27 Dated: October
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ATTESTATION REGARDING SIGNATURE

I, Michael R. Reese, hereby attest that I received permission from Charles Sipos, counsel for Defendant, to sign this e-filed document on his behalf.

Dated: October 11, 2013

/s/ Michael R. Reese