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Attorney for Plaintiff and the Proposed Class

10 Attorneys for Defendant
 11 L'ORÉAL USA, INC.

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA

15 Ligon,
 16 Plaintiff,
 17 vs.
 18 L'Oréal USA, Inc.,
 19 Defendant.

Case No. 3:12-cv-04585-RGS

**JOINT STIPULATION AND ~~[PROPOSED]~~
 ORDER EXTENDING TIME TO
 RESPOND TO THE COMPLAINT AND
 CONTINUING CASE MANAGEMENT
 CONFERENCE AND RELATED
 DEADLINES**

21 Pursuant to Local Rule 6-2, Plaintiff Nancie Ligon (“Plaintiff) and Defendant L’Oréal
 22 USA, Inc. (“L’Oréal or Defendant”) hereby submit, through the undersigned, the following Joint
 23 Stipulation requesting a further extension of time for L’Oréal to respond the complaint and
 24 continuing for approximately 30 days the scheduled initial Case Management Conference and
 25 related deadlines.

26 WHEREAS on August 30, 2012, Plaintiff filed her complaint in the above-titled action in
 27 the United States District Court, Northern District of California;

28 WHEREAS on September 6, 2012, Plaintiff served her complaint on Defendant;

1 WHEREAS Defendant's responsive pleading deadline was originally September 27, 2012,
2 but was extended by stipulation to November 16, 2012;

3 WHEREAS on October 15, 2012, the Court ordered a CMC to take place on January 17,
4 2013 at 10:00 a.m.;

5 WHEREAS on October 25, 2012, pursuant to stipulation, the Court further extended
6 L'Oréal's response deadline to January 29, 2013 and continued the CMC date to February 21,
7 2013 to allow the parties time to engage in informal discovery and to discuss the claims and
8 defenses;

9 WHEREAS the parties are still engaging in informal discovery on a confidential basis and
10 analyzing and discussing claims and defenses and would like the time to complete this process
11 before moving forward with litigation;

12 IT IS THEREFORE STIPULATED AND AGREED by and among Plaintiff and L'Oréal
13 through the undersigned, to extend L'Oréal's responsive pleading deadline to March 1, 2013, to
14 postpone the CMC until March 21, 2013 at 10:00 a.m. , or until the first available date thereafter,
15 and to continue all dates relating to the CMC accordingly.

16 SO STIPULATED:
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