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19 Attorneys for Defendant
 20 TODD CHRISTOPHER INTERNATIONAL, INC. DBA VOGUE INTERNATIONAL

21 UNITED STATES DISTRICT COURT
 22 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 23 SAN FRANCISCO DIVISION

24 ANDREA GOLLOHER, MARISA
 25 FREEMAN, ROBERTA CHASE, MICHAEL
 26 SHAPIRO and BRENDA BROWN, on behalf
 27 of themselves and all others similarly situated,

28 Plaintiffs,

vs.

TODD CHRISTOPHER INTERNATIONAL,
 INC. DBA VOGUE INTERNATIONAL, a
 Florida Corporation, and DOES 1-100,

Defendants.

Case No. 12-cv-06002-RS

**STIPULATED MOTION FOR
 ADMINISTRATIVE RELIEF TO RESET
 CLASS CERTIFICATION AND
 DISCOVERY DEADLINES IN LIGHT OF
 PENDING MEDIATION AND [PROPOSED]
 ORDER (N.D. Cal. Local Rule 7-11)**

Judge: Hon. Richard Seeborg
 Courtroom 3, 17th Floor

1 Pursuant to Local Rule 7-11, Plaintiffs Andrea Golloher, Marisa Freeman, Roberta Chase,
2 Michael Shapiro, and Brenda Brown (collectively, “Plaintiffs”) and defendant Todd Christopher
3 International, Inc. dba Vogue International (“Defendant”) (collectively, the “Parties”) hereby
4 request that the Court reset the class certification and other deadlines in the March 7, 2013 case
5 management scheduling order [ECF, No. 35] (the “Scheduling Order”) in order to accommodate
6 the Parties’ upcoming mediation. The parties recently scheduled a mediation for July 30, 2013¹,
7 and request an extension of the class certification and discovery deadlines of approximately 70
8 days in order to allow the parties to concentrate on the possible resolution of Plaintiffs’ claims
9 without simultaneously engaging in potentially unnecessary litigation.

10 The current deadline for Plaintiffs to file their motion for class certification is July 19,
11 2013, which is eleven days prior to the scheduled mediation. The Parties propose postponing this
12 deadline until September 30, 2013, which is sixty days following the date of the scheduled
13 mediation. The parties further propose postponing other deadlines in the Scheduling Order for a
14 commensurate seventy day period as set forth herein. Other than the deadlines specifically
15 referenced below, all other matters set forth in the Scheduling Order shall remain intact.

16 This is the first request by the parties to continue the case management deadlines and is not
17 made for the purpose of delay. Rather, the Parties believe that postponing the deadlines in
18 accordance with their proposal will facilitate the economical litigation of Plaintiffs’ claims.
19 Accordingly, the Parties respectfully request that the Court adopt the schedule set forth below.

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25 ¹ The Scheduling Order requires the Parties to engage in Private Mediation following
26 resolution of Defendant’s Motion to Dismiss. Although the Court has not yet ruled on such
27 motion, the Parties scheduled the mediation for July 30 as the parties’ chosen mediator, Randall
28 Wulff, has very limited availability. Moreover, the Parties are hopeful that they will still receive
guidance from the Court concerning Defendant’s motion to dismiss prior to the scheduled
mediation.

Event	Current Deadline Per 3/7/13 Scheduling Order	New Deadline Proposed by Parties
Opening brief for class certification	7/19/2013	9/30/2013
Opposition brief for class certification	60 days following filing of motion	60 days following filing of motion
Reply brief for class certification	40 days following filing of opposition	40 days following filing of opposition
Hearing on motion for class certification	On or after 14 days following filing of reply brief	On or after 14 days following filing of reply brief
Fact discovery completion date	1/3/2014	3/14/2014
Initial Expert disclosures	1/31/2014	4/11/2014
Rebuttal expert disclosures	3/14/2014	5/27/2014
Expert discovery completion date	4/14/2014	6/27/2014
Last date for hearing on pretrial motions	6/12/2014 at 1:30 p.m.	On or after 8/28/2014
Final Pretrial Conference	7/31/2014 at 10:00 a.m.	10/30/14 at 10:00 am On or after 10/16/2014
Trial	8/18/2014 at 9:00 a.m.	11/10/14 at 9:00 am On or after 11/3/2014

Respectfully Submitted,

LEXINGTON LAW GROUP

/s/ Mark N. Todzo

Mark N. Todzo

Attorneys for Plaintiffs

*Andrea Golloher, Marisa Freeman, Roberta Chase,
Michael Shapiro and Brenda Brown*

Dated: May 28, 2013

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COWAN LIEBOWITZ & LATMAN, P.C.

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/s/ Kieran G. Doyle

Attorneys for Defendant
Todd Christopher International, Inc.

IT IS SO ORDERED.

DATED: 5/31/13_____



Hon. Richard Seeborg
United States District Judge