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Attorneys for Defendant
PREMIER NUTRITION CORP.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

VINCENT D. MULLINS, individually and on) Case No. 3:13-cv-01271-RS
behalf of all others similarly situated,)

Plaintiff)

v.)

PREMIER NUTRITION CORP.)
f/k/a JOINT JUICE, INC.,)

Defendant.)

**JOINT STIPULATION AND
[PROPOSED] ORDER CONTINUING
INITIAL AND SUPPLEMENTAL
EXPERT DISCLOSURE DEADLINES**

Hon. Richard Seeborg

Current Dates: August 29, 2014 and
September 26, 2014

Proposed Dates: September 12, 2014 and
October 10, 2014

1 Pursuant to Local Rule 6-1 and 6-2, Plaintiff Vincent D. Mullins (“Plaintiff”), and
2 Defendant Premier Nutrition Corporation (“Defendant”), through their respective counsel of record
3 (collectively, “the Parties”), hereby stipulate and agree, subject to the Court’s approval, as follows:

4 WHEREAS, the initial expert disclosure deadline for any experts for summary judgment and
5 class certification in this matter is currently August 29, 2014;

6 WHEREAS, the supplemental expert disclosure deadline for any experts for summary
7 judgment and class certification in this matter is currently September 26, 2014;

8 WHEREAS, the parties have attempted to schedule key party depositions prior to the current
9 expert disclosure deadlines, however certain of these depositions were not able to be scheduled until
10 a time beyond or sufficiently in advance of the current deadlines;

11 WHEREAS, this request is made in good faith as an extension is necessary to allow the
12 Parties sufficient time to complete their expert reports in a timely and comprehensive manner;

13 WHEREAS, this is only the second time the Parties have sought an extension of the expert
14 disclosure deadlines, and the deadlines were previously extended by only two weeks;

15 WHEREAS, this extension will not affect any other deadlines set by the Court; and

16 WHEREAS, this extension will not affect any pre-trial or trial dates as no dates have been
17 set for trial.

18 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties, through
19 their respective counsel and subject to the Court’s approval, that:

- 20 1) the deadline for the Parties to exchange initial expert disclosures for summary judgment
21 and class certification is extended from August 29, 2014 to September 12, 2014; and
22 2) the deadline for the Parties to exchange supplemental expert disclosures for summary
23 judgment and class certification is extended from September 26, 2014 to October 10,
24 2014.

25
26 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

1 Dated: August 19, 2014

By: /s/ Angel A. Garganta

Angel A. Garganta

2 **VENABLE LLP**

3 Angel A. Garganta

4 Guido E. Toscano

5 **ARNOLD & PORTER LLP**

6 Trenton H. Norris

7 Anton A. Ware

8 Attorneys for Defendant

9 PREMIER NUTRITION CORP.

10 Dated: August 19, 2014

By: /s/ by consent, Thomas Joseph O'Reardon, II

Timothy G. Blood (SBN 149343)

Thomas Joseph O'Reardon, II (SBN 247952)

11 **BLOOD HURST O'REARDON LLP**

12 Attorneys for Plaintiff

13 Vincent D. Mullins

14 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

15 Dated: 8/19/14

16 

Honorable Richard Seeborg

17 United States District Court Judge