

1 Counsel Listed on Signature Page

2 UNITED STATES DISTRICT COURT  
3 NORTHERN DISTRICT OF CALIFORNIA  
4 SAN FRANCISCO DIVISION

5 DAVID HANSELL, EDWARD TOOLEY,  
6 and CHRISTOPHER VALDEZ, individually  
7 and on behalf of all others similarly situated

8 Plaintiffs,

9 v.

10 TRACFONE WIRELESS, INC., d.b.a.  
11 STRAIGHT TALK WIRELESS, and  
12 WAL-MART STORES, INC.,

13 Defendants.

Case No.: 13-cv-3440-EMC

**JOINT STIPULATION AND  
[PROPOSED] ORDER REGARDING  
MODIFIED CASE SCHEDULE  
PURSUANT TO LOCAL RULES 6-1(B),  
6-2, AND 7-12**

14 MARTIN BLAQMOOR, individually and on  
15 behalf of all others similarly situated,

16 Plaintiff,

17 v.

18 TRACFONE WIRELESS, INC.

19 Defendant.

Case No. 13-cv-05295-EMC

20 MONA GANDHI, MARISHA JOHNSTON,  
21 and MARSHALL TIETJE, individually and  
22 on behalf of all others similarly situated,

23 Plaintiffs,

24 v.

25 TRACFONE WIRELESS, INC.

26 Defendant.

Case No. 13-cv-05296-EMC

1 JOHN BROWNING, on behalf of himself and  
2 all others similarly situated,

3 Plaintiff,

4 v.

5 TRACFONE WIRELESS, INC. d/b/a  
6 STRAIGHT TALK WIRELESS, NET10  
7 WIRELESS, SIMPLE MOBILE and  
8 TELCEL AMERICA and WAL-MART  
9 STORES, INC.,

10 Defendant.

Case No. 14-cv-01347-EMC

1 WHEREAS, pursuant to the Court's May 23, 2014 orders, the current schedule is as follows:

2	September 22, 2014	Completion of Confirmatory Discovery Re: Settlement
3	September 30, 2014	Opposition to Motion for Preliminary Approval
4	October 21, 2014	Reply in Support of Motion for Preliminary Approval
5	November 13, 2014	Hearing on Motion for Preliminary Approval/CMC

6 WHEREAS, the *Hansell* Plaintiffs have asked to take the deposition of Wal-Mart's Mehrdad  
7 Akbar as part of confirmatory discovery.

8 WHEREAS, Mr. Akbar's next available date for a full-day deposition is September 30, 2014  
9 and the parties are also available on this date.

10 WHEREAS, September 30, 2014 is after the discovery cut-off and the same day as the  
11 *Hansell* Plaintiffs' Opposition to Motion for Preliminary Approval is due.

12 WHEREAS, the Court has previously ordered the following time modifications:

13 *Hansell* Dkt. 27, 28: Extending time to file answer  
14 *Hansell* Dkt. 61, *Blaqmoor* Dkt. 29, *Gandhi* Dkt. 29: Rescheduling CMC  
15 *Blaqmoor* Dkt. 16, *Gandhi* Dkt. 16: Modifying schedule on arbitration motion  
16 *Hansell* Dkt. 72, *Blaqmoor* Dkt. 38, *Gandhi* Dkt. 50: Rescheduling hearing on  
17 motion to stay.

18 WHEREFORE, the parties stipulate to the following modified schedule, pushing back the  
19 discovery cut-off and each briefing deadline by eight days, to allow the *Hansell* Plaintiffs to take Mr.  
20 Akbar's deposition prior to the close of discovery and the filing of their Opposition to the Motion for

21 Preliminary Approval:

22	September 30, 2014	Completion of Confirmatory Discovery Re: Settlement
23	October 8, 2014	Opposition to Motion for Preliminary Approval
24	October 29, 2014	Reply in Support of Motion for Preliminary Approval
25	November 13, 2014, 1:30 p.m. (or as soon 26 thereafter as may be convenient to the Court)	Hearing on Motion for Preliminary Approval/CMC <sup>1</sup>

27 <sup>1</sup> The parties remain prepared to proceed on November 13, 2014 for the hearing on the motion for  
28 preliminary approval. However, the parties recognize that entry of this modified schedule would

1 **IT IS SO STIPULATED.**

2 DATED: August 20, 2014

Respectfully submitted,

3 SIDLEY AUSTIN LLP

4 By: /s/ Joel S. Feldman

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*Attorneys for Defendants*

18 DATED: August 20, 2014

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*Attorneys for the Hansell, Blaqmoor, and  
Gandhi Plaintiffs*

allow the Court eight fewer days than previously scheduled between the filing of the reply brief and the hearing date, and that, should the stipulation be entered, the Court may wish to move the hearing date back by a short period of time.

1 DATED: August 20, 2014

By: /s/ Clayeo C. Arnold

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*Attorneys for the Browning Plaintiffs*

24 **SIGNATURE ATTESTATION**

25 I am the ECF User whose identification and password are being used to file the foregoing  
26 document. In compliance with General Order 45.X.B., I hereby attest that the signatory has  
27 concurred in this filing.

28 Dated: August 20, 2014

SIDLEY AUSTIN LLP

By: /s/ Ryan M. Sandrock

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2  
3 DATED: 8/26/14



4  
5 HON. EDWARD M. CHEN  
UNITED STATES DISTRICT JUDGE

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