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13 Attorneys for Plaintiff ROBERT VERDINA

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 15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA
 17

18 ROBERT VERDINA,

19 Plaintiff,

20 v.

21 CVS CAREMARK CORPORATION, a
 Delaware Corporation; CVS RX
 22 SERVICES, INC., a New York
 Corporation; AMRIT VIRDEE, an
 23 individual; RUI CAMACHO, an
 individual, and DOES 1 through 120,

24 Defendant.
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Case No. 3:13-cv-04359-MMC

**JOINT STIPULATED REQUEST AND
 [PROPOSED] ORDER TO EXTEND
 DEADLINE FOR MANDATORY
 SETTLEMENT CONFERENCE**

Judge: Hon. Maxine M. Chesney
 Dept: Courtroom 7, 19th Floor

Trial Date: December 8, 2014

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 27 Plaintiff, Robert Verdina (“Plaintiff”), and Defendants CVS CAREMARK
 CORPORATION, CVS RX SERVICES, AMRIT VIRDEE, and RUI CAMACHO (“Defendants”),
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1 file this Joint Stipulated Request to extend the date for Mandatory Settlement Conference from May
2 29, 2014 to July 10, 2014, or as soon thereafter as the court be available. As grounds for this
3 Motion, the Parties state:

- 4 1. Littler Mendelson, P.C. began representing CVS in this manner on February 14, 2014.
- 5 2. The two named individual defendants, Rui Camacho and Amritpal Virdee, made their first
6 appearance in this case on May 6, 2014.
- 7 3. Pursuant to the January 10, 2014 Civil Pretrial Minutes, the case was “referred to Magistrate
8 Judge Nathaneal Cousins for a Settlement Conference, to be conducted in late in late May or
9 early June – his calendar permitting.” Pursuant to the Court’s January 14, 2014 Order
10 Setting Settlement Conference, the date set for the Mandatory Settlement Conference is
11 currently May 29, 2014.
- 12 4. Counsel for the parties agree that settlement discussions would be premature and very likely
13 unsuccessful prior to the deposition of all named parties.
- 14 5. Plaintiff and CVS have engaged in good faith discovery efforts and have completed one
15 round of written discovery. The Parties require additional time to conduct depositions of one
16 of the named individual defendants and the plaintiff.
- 17 6. The Parties anticipate that they will not be able to complete the pending depositions by the
18 current settlement conference date because of the challenges associated with, and additional
19 time needed for, coordinating the deposition of one named defendant among counsel and the
20 witness’ schedules prior to May 29, 2014.
- 21 7. The Parties have met and conferred and agree that they would be available on July 10, 2014
22 to conduct the Mandatory Settlement Conference. The Parties have checked with Magistrate
23 Judge Cousins’ clerk and are of the information and belief that this date is agreeable to
24 Magistrate Judge Cousins as well.
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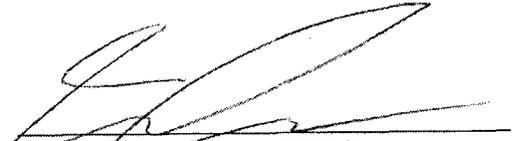
8. Accordingly, the Parties respectfully request that the Court reschedule the Mandatory Settlement Conference from May 29, 2014 to July 10, 2014, or as soon thereafter as is practicable.

9. Neither Party will be prejudiced by the extension of this date. Both Parties will, however, be prejudiced if the Court denies this Motion and prevents them from conducting the pending depositions to develop the factual record in this case.

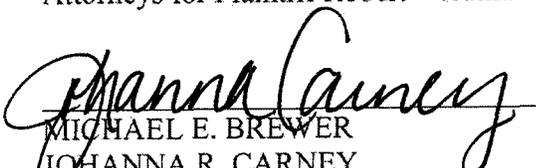
WHEREFORE, the Parties respectfully request that the Court extend the current deadline to conduct a settlement conference as set forth above.

Respectfully submitted,

Dated: May/2, 2014


ARTHUR C. CHAMBERS
JOONG Y. IM
ILONA BRUSIL
Attorneys for Plaintiff Robert Verdina

Dated: May/2, 2014


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JOHANNA R. CARNEY
LITTLER MENDELSON
A Professional Corporation
Attorneys for Respondents
CVS CAREMARK CORPORATION
CVS RX SERVICES, INC.

IT IS SO ORDERED.

Dated: May 20, 2014


HONORABLE MAXINE M. CHESNEY
U.S. DISTRICT COURT JUDGE