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7 Attorneys for Defendant
8 WHOLE FOODS MARKET GROUP, INC.

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12

13 MARY GARRISON and GRACE
14 GARRISON, individually, and on behalf of all
others similarly situated,

15 Plaintiffs,

16 v.

17 WHOLE FOODS MARKET GROUP, INC.,

18 Defendant.

Case No. 4:13-CV-05222-VC

**STIPULATION AND ~~PROPOSED~~
INITIAL SCHEDULING ORDER**

19 Pursuant to Local Rule 7-12, Plaintiffs MARY GARRISON and GRACE GARRISON,
20 individually, and on behalf of all others similarly situated (collectively “Plaintiffs”), on the one
21 hand, and Defendant WHOLE FOODS MARKET GROUP, INC. (“Defendant”), by and through
22 their undersigned counsel, hereby stipulate as follows:

23 WHEREAS, on July 29, 2014, the Parties appeared for a case management conference
24 before the Court.

25 WHEREAS, at the case management conference, the Parties discussed with the Court an
26 updated proposed initial litigation schedule to include an initial phase of fact discovery directed
27 to information necessary to prepare for a private mediation.
28

1 WHEREAS, after hearing from the Parties, the Court requested that the Parties submit a
2 stipulation and proposed initial scheduling order consistent with the Parties' proposal.

3 IT IS THEREFORE STIPULATED that:

- 4 1. The Parties shall exchange initial disclosures on or before August 18, 2014;
- 5 2. The Parties shall have until December 15, 2014 to engage in an initial phase of
6 written fact and document discovery targeted to information necessary to prepare for mediation
7 and complete the depositions of Plaintiffs;
- 8 3. The Parties shall participate in a private mediation on or before February 2, 2015;
9 and
- 10 4. The Parties shall appear for a Further Case Management Conference if necessary
11 on February 10, 2015 or as soon thereafter as is convenient for the Court, with a Joint Case
12 Management Conference Statement due no later than one week before the Conference.

13 IT IS SO STIPULATED.

14 DATED: August 1, 2014

SEYFARTH SHAW LLP

16 By: _____
17 Jay W. Connolly
18 Giovanna A. Ferrari
19 Joseph J. Orzano

Attorneys for Defendant
WHOLE FOODS MARKET GROUP, INC.

20 DATED: August 1, 2014

SCOTT COLE & ASSOCIATES, APC

22 By: _____
23 Matthew R. Bainer
24 Molly a. DeSario
25 Courtland W. Creekmore

Attorneys for Plaintiffs
MARY GARRISON and GRACE
26 GARRISON, individually and on behalf of all
27 other similarly situated
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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

1 The Parties shall exchange initial disclosures on or before August 18, 2014;

2 2. The Parties shall have until December 15, 2014 to engage in an initial phase of
3 written fact and document discovery targeted to information necessary to prepare for mediation
4 and complete the depositions of Plaintiffs;

5 3. The Parties shall participate in a private mediation on or before February 2, 2015;
6 and

7 4. The Parties shall appear for a Further Case Management Conference if necessary
8 on February 10, 2015 or as soon thereafter as is convenient for the Court. An updated Joint Case
9 Management Statement shall be due no later than one week before the Conference.

DATED: August 1, 2014



HON. VINCE CHHABRIA
United States District Court Judge

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