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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. 3:13-CV-05222-VC

**STIPULATION AND ~~PROPOSED~~
 ORDER FOR LIMITED
 MODIFICATION TO SCHEDULING
 ORDER**

19
 20 Pursuant to Local Rule 6-1(b), Plaintiffs MARY GARRISON and GRACE GARRISON,
 21 individually, and on behalf of all others similarly situated (collectively “Plaintiffs”), on the one
 22 hand, and Defendant WHOLE FOODS MARKET GROUP, INC. (“Defendant”), by and through
 23 their undersigned counsel, hereby stipulate as follows:

24 WHEREAS, on March 18, 2015, the Court ordered that the Parties submit a stipulated
 25 ESI Protocol on or before March 24, 2015 to the extent the Parties were able to reach an
 26 agreement by that time. To the extent the Parties did not reach an agreement by that time, the
 27 Court ordered the Parties to provide an update to the Court in their Updated Joint Case
 28 Management Conference Statement.

1 WHEREAS, in the Parties Joint Updated Case Management Conference Statement, the
2 Parties indicated that they would be prepared to file a joint letter brief as to their dispute
3 regarding the development of a stipulated ESI Protocol on or before April 3, 2015.

4 WHEREAS, at the March 31, 2015 case management conference, the Parties discussed
5 with the Court their subsequent efforts to confer and agreed to file an ESI Protocol or joint letter
6 brief regarding any outstanding dispute as to the development of an ESI Protocol on or before
7 April 10, 2014.

8 WHEREAS, the Court requested the Parties submit a stipulation documenting the agreed
9 proposal.

10 IT IS THEREFORE STIPULATED that:

11 1. Instead of filing a joint letter brief to the Court on or before April 3, 2015, the
12 Parties shall submit a stipulated ESI Protocol or joint letter brief as to any issues in dispute
13 regarding the development of an ESI Protocol on or before April 10, 2015.

14 2. All other deadlines remain unchanged.

15 IT IS SO STIPULATED.

16 DATED: April 2, 2015

SEYFARTH SHAW LLP

17 By: /s/ Joseph J. Orzano

Jay W. Connolly
Giovanna A. Ferrari
Joseph J. Orzano

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19
20 Attorneys for Defendant
WHOLE FOODS MARKET GROUP, INC.

21 DATED: April 2, 2015

SCOTT COLE & ASSOCIATES, APC

22 By: /s/ Molly A. Desario

23 Matthew R. Bainer
Molly a. DeSario

24 Attorneys for Plaintiffs
25 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. Instead of filing a joint letter brief to the Court on or before April 3, 2015, the Parties shall submit a stipulated ESI Protocol or joint letter brief as to any issues in dispute regarding the development of an ESI Protocol on or before April 10, 2015.

2. All other deadlines remain unchanged.

DATED: April 6, 2015



HON. VINCE CHHABRIA
United States District Court Judge

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