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14 *Attorneys for Plaintiff Gena Hanson, Individually*
 15 *and on Behalf of All Others Similarly Situated*

Attorneys for Defendant JQD, LLC d/b/a PRO
 SOLUTIONS

16
 17 **IN THE UNITED STATES DISTRICT COURT**
 18 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

19 **GENA HANSON**, individually and on behalf of)
 20 all others similarly situated,)
 21 Plaintiff,)
 22 v.)
 23 **JQD, LLC, d/b/a PRO SOLUTIONS**, a)
 24 California corporation;)
 25 Defendant.)
 26

Case No. 4:13-cv-05377-RS)
)
) **JOINT STIPULATION TO CONTINUE**
) **DISCOVERY CUT-OFF AND [PROPOSED]**
) **ORDER**
)
) Courtroom: 3
) Judge: Hon. Richard Seeborg

27
 28 **JOINT STIPULATION TO CONTINUE DISCOVERY CUT-OFF AND [PROPOSED]**
ORDER; Case No. 4:13-cv-05377-RS

1 WHEREAS Plaintiff Gena Hanson, individually and on behalf of others similarly situated, and
2 Defendant JQD, LLC, d/b/a/ Pro Solutions, (collectively, the “Parties”) have been engaging in
3 settlement discussions;

4 WHEREAS the Parties are attempting to schedule a mediation during the month of January or
5 February;

6 WHEREAS the Parties have focused their time and resources towards resolution over the past
7 three months;

8 WHEREAS the Parties do not anticipate being able to complete non-expert discovery by the
9 current discovery cut-off of February 6, 2015.

10 NOW, THEREFORE, the Parties hereby STIPULATE to continue the non-expert discovery
11 cut-off by one hundred twenty one (121) days to June 7, 2015 (the same day as the expert discovery
12 cut-off). All other dates previously set by the Court will remain unchanged.

13
14 Respectfully submitted,
15 Dated: January 12, 2015

COTCHETT, PITRE & McCARTHY, LLP

16 By: /s/ Justin T. Berger
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18 ANNE MARIE MURPHY
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Attorneys for Plaintiff and the Proposed Class

23
24 Dated: January 12, 2015

LEWIS BRISBOIS BISGAARD & SMITH LLP

25 By: /s/ Stephen H. Turner
26 STEPHEN H. TURNER

*Attorneys for Defendant JQD, LLC d/b/a
27 PRO SOLUTIONS*

~~PROPOSED~~ ORDER

Pursuant to the STIPULATION of the Parties, it is hereby ordered that the discovery cut-off be extended one hundred twenty one (121) days from February 6, 2015, to June 7, 2015.

IT IS SO ORDERED.

DATED: 1/13/15



Honorable Richard Seeborg
Judge for the United States District Court