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9 **UNITED STATES DISTRICT COURT**
10 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

11 KATHLEEN DUNN and PATRICK
12 CAMPBELL, individually and on behalf of
13 all others similarly situated,

14 Plaintiffs,

15 v.

16 TEACHERS INSURANCE & ANNUITY
17 ASSOCIATION OF AMERICA, a New
18 York entity; EXPERIS US, INC.; PRIDE
19 TECHNOLOGIES, LLC; and DOES 1 to
20 10, inclusive,

21 Defendants.

CASE NO. 3:13-cv-05456-HSG

**STIPULATED REQUEST FOR FURTHER
CASE MANAGEMENT CONFERENCE**

Complaint Filed: November 25, 2013

22 Pursuant to Civil Local Rule 7-12, Plaintiffs Kathleen Dunn, Patrick Campbell,
23 Fred Hickson, and Karen Hobson ("Plaintiffs") and Defendant Experis US, Inc.
24 ("Experis") (collectively, "the Parties") hereby file their stipulated request for Case
25 Management Conference as follows:
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1 WHEREAS, Plaintiffs have opted not to seek conditional certification in this matter
2 and the Parties are continuing to discuss the potential for resolving the individual claims.

3 THEREFORE, THE PARTIES AGREE AND STIPULATE TO THE
4 FOLLOWING: The Parties respectfully request that a further Case Management
5 Conference be set in the next 30 to 60 days to establish a discovery schedule, expert
6 deadlines and trial schedule on the individual claims in the event Plaintiffs and Experis
7 (the remaining Defendant) are unable to settle the case.
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10 **IT IS SO STIPULATED.**

11 Dated: January 6, 2017
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13 By: /s/ Gabriel Assaad
14 Gabriel Assaad
15 KENNEDY HODGES
16 711 West Alabama Street
17 Houston, Texas 77006
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20 Dated: January 6, 2017
21

22 By: /s/ Spencer C. Skeen
23 Spencer C. Skeen
24 OGLETREE, DEAKINS, NASH, SMOAK &
25 STEWART, P.C.
26 4370 La Jolla Village Drive, Suite 990
27 San Diego, California 92122
28 Telephone: (858) 652-3100

1 Pursuant to Local Rule 5-1(i)(3), I certify that all other signatories listed, on whose
2 behalf the filing is submitted, concur in the filing's content and have authorized the filing.

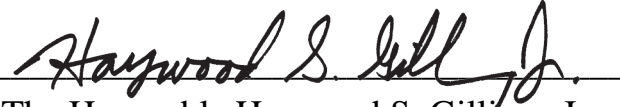
3 Dated: January 6, 2017
4

5 By: /s/ Gabriel Assaad
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1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2 A further Case Management Conference is scheduled in this matter for
3 January 17, 2017, before Judge Haywood S. Gilliam, Jr., at 2:00 p.m., in Courtroom 10,
4 19th Floor, 450 Golden Gate Avenue, San Francisco, CA.

5 Dated: January 9, 2017

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7 The Honorable Haywood S. Gilliam, Jr.
8 United States District Judge
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