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7 Attorneys for Defendants
WHOLE FOODS MARKET CALIFORNIA, INC.,
8 and MRS. GOOCH'S NATURAL FOOD MARKETS,
9 INC.

10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13

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

16 Plaintiffs,

17 v.

18 WHOLE FOODS MARKET CALIFORNIA,
19 INC., MRS. GOOCH'S NATURAL FOODS
MARKET, INC., WHOLE FOODS MARKET
20 ROCKY MOUNTAIN/SOUTHWEST, L.P.,
and WHOLE FOODS MARKET PACIFIC
21 NORTHWEST, INC.,

22 Defendants.

Case No. 4:14-CV-00334 VC

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

23 Pursuant to Local Rule 7-12, Plaintiffs MARY GARRISON and GRACE GARRISON,
24 individually, and on behalf of all others similarly situated (collectively "Plaintiffs"), on the one
25 hand, and Defendants WHOLE FOODS MARKET CALIFORNIA, INC. and MRS. GOOCH'S
26 NATURAL FOOD MARKETS, INC. (collectively "Defendants"), by and through their
27 undersigned counsel, hereby stipulate as follows:

28 ///

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

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

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

8 IT IS THEREFORE STIPULATED that:

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

10 2. The Parties shall have until December 15, 2014 to engage in an initial phase of
11 written fact and document discovery focused on information necessary to prepare for mediation
12 and complete the deposition of Plaintiffs;

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

15 4. The Parties shall appear for a further case management conference if necessary on
16 February 10, 2015 or as soon thereafter as is convenient for the Court, with a Joint Case
17 Management Conference Statement due no later than one week before the Conference.

18 IT IS SO STIPULATED.

19 DATED: August 1, 2014

SEYFARTH SHAW LLP

20 By:

21 Jay W. Connolly
22 Giovanna A. Ferrari
23 Joseph J. Orzano

24 Attorneys for Defendant
25 WHOLE FOODS MARKET CALIFORNIA,
26 INC. and MRS. GOOCH'S NATURAL FOOD
27 MARKETS, INC.
28

1 DATED: August 1, 2014

SCOTT COLE & ASSOCIATES, APC

2 By: _____

3 Matthew R. Bainer
4 Molly a. DeSario
Courtland W. Creekmore

5 Attorneys for Plaintiffs
6 MARY GARRISON and GRACE
GARRISON, individually and on behalf of all
7 other similarly situated

8 ~~PROPOSED~~ ORDER

9 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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

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

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

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

19
20 DATED: August 1, 2014



21 HON. VINCE CHHABRIA
United States District Court Judge

22 17675995v.2