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11	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA	
12	NORTHERN DISTRICT C	OF CALIFORNIA
13	JOSEPH DURAN, JOHN BELL, JASON MEARS,	Case No. 3:14-CV-01184 RS
14	VICTOR DESIMONE, CHRISTINA LEE and SARAH CATALDO,	STIPULATION AND [PROPOSED]
15		ORDER TO EXTEND CERTAIN DEADLINES
16	Plaintiffs,	Hon. Richard Seeborg
17	VS.	2000.000
18	THE HERSHEY COMPANY,	
19	Defendant.	
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24 25		
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MORGAN, LEWIS & BOCKIUS LLP ATTORNEYS AT LAW SAN FRANCISCO		STIPULATION AND [PROPOSED] ORDER TO EXTEND CERTAIN DEADLINES CASE NO.: 3:14-CV-01184 RS

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Joseph Duran, John Bell, Jason Mears, Victor DeSimone, Christina Lee, and Sarah Cataldo ("Plaintiffs") and Defendant The Hershey Company ("Defendant") (collectively, "Parties"), through their respective counsel of record, and subject to the approval of the Court, hereby stipulate as follows:

- 1. WHEREAS, on June 26, 2014, the Court issued a Case Management Order setting certain deadlines (Dkt. No. 23);
- 2. WHEREAS, the Parties are currently engaged in discovery, have scheduled certain depositions, and are working toward negotiating an ESI agreement;
- 3. WHEREAS, the parties have agreed to the extension of certain deadlines as follows:

Event	Current Deadline	Proposed Deadline
Expert Disclosures	January 22, 2015	March 17, 2015
Mediation Deadline	January 30, 2014	April 30, 2015
Supplemental and Rebuttal Expert Designations	February 12, 2015	April 7, 2015
Close of Fact and Expert Discovery	March 5, 2015	May 5, 2015
Case Management Conference	March 12, 2015	May 14, 2015
Deadline for Dispositive Motions to Be Heard	March 19, 2015	May 28, 2015
Motions in Limine	May 11, 2015	June 11, 2015
Oppositions to Motions in Limine	May 18, 2015	June 18, 2015
Final Pretrial Conference	May 21, 2015	June 25, 2015

- 4. WHEREAS, the Parties have previously requested an extension of the mediation deadline, but have not requested extensions of the other deadlines;
- 5. WHEREAS, the Parties do not believe that an extension of these deadline will affect the Court's schedule for this case, including the trial date (July 13, 2015).

THEREFORE, the Parties hereby agree and stipulate to the proposed deadlines included above.

1	IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.		
2			
3	DATED: December 30, 2014.	MORGAN, LEWIS & BOCKIUS LLP DARYL S. LANDY	
4		MICHAEL J. PUMA CHRISTOPHER D. HAVENER	
5		CHRISTOPHER D. HAVENER	
6		By: /s/Michael J. Puma	
7		Michael J. Puma	
8		Attorneys for Defendant THE HERSHEY COMPANY	
9			
10			
11			
12	DATED: December 30, 2014.	BRANDI LAW FIRM THOMAS J. BRANDI	
13		BRIAN J. MALLOY	
14			
15		HOBAN & FEOLA, LLC DAVID C. FEOLA	
16			
17		By: /s/ David C. Feola David C. Feola	
18		Attorneys for Plaintiffs	
19		·	
20	PURSUANT TO STIPULATION, IT IS SO ORDERED.		
21		Wild Seeling	
22	DATED: <u>1/2/15</u>	Hon. Richard Seeborg	
23		United States District Court Judge	
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MORGAN, LEWIS &
BOCKIUS LLP
ATTORNEYS AT LAW
SAN FRANCISCO