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10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA

13 JOSEPH DURAN, JOHN BELL, JASON MEARS,  
 14 VICTOR DESIMONE, CHRISTINA LEE and  
 SARAH CATALDO,

16 Plaintiffs,

17 vs.

18 THE HERSHEY COMPANY,

19 Defendant.

Case No. 3:14-CV-01184 RS

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO EXTEND CERTAIN  
 DEADLINES**

Hon. Richard Seeborg

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

5 1. WHEREAS, on June 26, 2014, the Court issued a Case Management Order setting  
6 certain deadlines (Dkt. No. 23);

7 2. WHEREAS, on October 16, 2014 and January 1, 2015, the Court issued Orders  
8 approving the Parties’ stipulations to extend the mediation deadline and certain other deadlines in  
9 this matter (Dkt. Nos. 29 & 31);

10 3. WHEREAS, the Parties are actively engaged in discovery. The Parties have  
11 produced substantial documents, negotiated an ESI agreement, begun producing ESI pursuant to  
12 that agreement; Defendant has taken the depositions of all Plaintiffs; Defendant is in the process  
13 of responding to three additional sets of written discovery recently served by Plaintiffs that will  
14 require additional ESI searches; and the Parties are working together to schedule more than a  
15 dozen depositions of Defendant and its employees;

16 4. WHEREAS, the Parties are currently scheduled to participate in a private  
17 mediation on April 9, 2015;

18 5. WHEREAS, Plaintiffs have requested that the depositions of Defendant’s  
19 witnesses be held after the Parties engage in mediation on April 9, 2015, in part due to an injury  
20 which has prevented one of Plaintiffs’ counsel from traveling for purposes of the case;

21 6. WHEREAS, the Parties seek an extension of the deadlines proposed below in  
22 order to facilitate the Parties’ attempt to resolve this matter and conserve the resources of the  
23 Court and the Parties, as well as to provide adequate time to complete discovery in advance of  
24 summary judgment briefing and obtain a ruling on summary judgment in advance of trial and  
25 related pre-trial deadlines;

26 7. WHEREAS, the Parties have not previously requested an extension of the trial  
27 date;



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HOBAN & FEOLA, LLC  
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By: /s/ David C. Feola  
David C. Feola

Attorneys for Plaintiffs

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 3/23/15



Hon. Richard Seeborg  
United States District Court Judge