

1 LATHAM & WATKINS LLP
 Patrick E. Gibbs (Bar No. 183174)
 2 Allison S. Davidson (Bar No. 267964)
 Cara A. Gray (Bar No. 282865)
 3 140 Scott Drive
 Menlo Park, California 94025
 4 Telephone: +1.650.328.4600
 Facsimile: +1.650.463.2600

5 Attorneys for Defendant
 6 Safeway, Inc. and the Individual Defendants

7
 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 OAKLAND DIVISION

11 LAWRENCE ROMANECK, Individually and
 on Behalf of All Others Similarly Situated,

12 Plaintiff,

13 v.

14 SAFEWAY, INC., ROBERT EDWARDS,
 15 JANET E. GROVE, MOHAN GYANI,
 FRANK C. HERRINGER, GEORGE J.
 16 MARROW, KENNETH W. ODER, T. GARY
 ROGERS, ARUN SARIN, WILLIAM Y.
 17 TAUSCHER, CERBERUS CAPITAL
 MANAGEMENT L.P., AB ACQUISITION
 18 LLC, ALBERSTON'S HOLDINGS LLC,
 ALBERTSON'S LLC, and SATURN
 19 ACQUISITION MERGER SUB, INC.,

20 Defendants.

Case No. 4:14-cv-02015

CLASS ACTION

**STIPULATION EXTENDING TIME FOR
 DEFENDANT SAFEWAY, INC. AND THE
 INDIVIDUAL DEFENDANTS TO
 RESPOND TO THE COMPLAINT
 AND ORDER**

21
 22 WHEREAS, this action ("Complaint") was filed on May 1, 2014;

23 WHEREAS, Defendant Safeway, Inc. ("Safeway") was served with the summons and
 24 Complaint on May 6, 2014;

25 WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a)(1), Safeway's response is
 26 currently due on May 27, 2014;

27
 28

1 WHEREAS, Rule 6-1(a) of the Civil Local Rules of the Northern District of California
2 provides that the parties may stipulate to extend the time within which to answer or otherwise
3 respond to the Complaint without a Court Order;

4 WHEREAS, the parties have agreed to a 30 day extension of time by which Safeway will
5 respond to the Complaint;

6 WHEREAS Defendants Robert Edwards, Janet Grove, Mohan Gyani, Frank Herringer,
7 George Marrow, Kenneth Oder, T. Gary Rogers, Arun Sarin, and William Tauscher (“Individual
8 Defendants”) agreed to waive service as of May 9, 2014;

9 NOW, THEREFORE, the undersigned parties, through their respective counsel, stipulate
10 as follows:

11 Safeway and the Individual Defendants shall move against, answer or otherwise respond
12 to the Complaint by and including June 26, 2014.

13 Dated: May 14, 2014

14 Respectfully submitted,
15 LATHAM & WATKINS LLP

16 By: /s/ Patrick E. Gibbs
17 Patrick E. Gibbs

18 Attorneys for Defendant Safeway, Inc.

19
20 Dated: May 14, 2014

21 GLANCY BINKOW & GOLDBERG LLP

22 By: /s/ Lionel Z. Glancey
23 Lionel Z. Glancey
24 Michael Goldberg
25 Louis N. Goldberg

26 Attorneys for Plaintiff Lawrence Romaneck

27 Date: May 15, 2014

