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18 [ADDITIONAL COUNSEL LISTED BELOW]  
19

20 UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION  
21

22 VLAD TYSN, individually and on behalf of  
all others similarly situated,

23 Plaintiff,

24 vs.

25 WELLS FARGO ADVISORS, LLC,

26 Defendant.  
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Case No. 14-cv-02552-LB

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND CASE DEADLINES**

Judge: Hon. Laurel Beeler

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Attorneys for Plaintiff  
VLAD TYSN

1 **STIPULATION**

2 WHEREAS, Plaintiffs Vlad Tsyn, Catherine Horan-Walker, Daniel Silbermann  
3 (“Plaintiffs”) bring this action against Defendant Wells Fargo Advisors, LLC (“WFA”) alleging  
4 putative class action claims under California law as well as individual claims under the federal  
5 Fair Labor Standards Act (“FLSA”);

6 WHEREAS, Plaintiffs initially pursued their FLSA claims on a putative collective  
7 action basis, but in light of the Court ruling on WFA’s motions for partial summary judgment,  
8 Plaintiffs, reserving their appellate rights, have confirmed that they will not be pursuing  
9 certification of the putative collective action in this case, and so Plaintiffs’ still pending FLSA  
10 claims will proceed on an individual basis only, and there is no need to schedule conditional  
11 certification proceedings;

12 WHEREAS, on August 11, 2016, this Court held a Further Case Management  
13 Conference during which conference the Court established certain deadlines, including the  
14 deadlines for a Motion re: Class Certification (currently set for February 9, 2017) (ECF No. 145);

15 WHEREAS, the Parties are still engaged in discovery pertinent to the anticipated  
16 litigation of the propriety of class certification, including taking a multi-topic deposition under  
17 Fed. R. Civ. Pro. 30(b)(6), which was delayed due the witness’ schedule and then again because,  
18 on the date of the deposition, Plaintiffs’ counsel’s flight was cancelled due to severe weather;

19 WHEREAS, the Parties agree, as in the past, to meet and confer following the  
20 filing of any motion to attempt to agree on a briefing and hearing schedule and, if needed, then  
21 submit any resulting dispute to the Court;

22 WHEREAS, the Parties have requested extensions of the case deadlines in the past;

23 WHEREAS, in order to preserve the time and resources of the Court and of the  
24 Parties while the Parties continue to engage in discovery, good cause exists to continue the class  
25 certification briefing and other case deadlines; and,

26 WHEREAS, the Parties would be happy to attend an in person or telephonic  
27 scheduling conference with the Court if the Court has any concerns about the schedule set forth in  
28 this Stipulation;

1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and  
2 among the respective Parties hereto, that, as the Court's schedule permits, the current schedule be  
3 adjusted as follows:

4 Case Event	Current Filing Deadline/Hearing Date	Proposed Extended Filing Deadline/Hearing Date
5 Filing of Motion re: 6 Class Certification	2/9/2017	7/28/2017
7 Last hearing date for 8 dispositive motions 9 and/or further case 10 management conference	5/4/2017, at 9:30a.m.	10/26/2017, at 9:30a.m.
11 Meet and confer re 12 pretrial filings	7/28/2017	12/7/2017
13 Pretrial filings due	8/10/2017	12/21/2017
14 Oppositions, Objections, 15 Exhibits, and Depo 16 Designations due	8/24/2017	1/18/2018
17 Final Pretrial 18 Conference	9/28/2017, at 1:30 p.m.	2/3/2018, at 1:30 p.m.
19 Trial	10/10/2017, at 8:30 a.m.	2/12/2018, at 8:30 a.m.

20 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

21 DATED: February 21, 2017

WYNNE LAW FIRM  
EDWARD J. WYNNE

22 By: /s/ Edward J. Wynne

EDWARD J. WYNNE

23 Attorneys for Plaintiff  
24 VLAD TYSN

1 DATED: February 21, 2017

MUNGER, TOLLES & OLSON LLP

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By: /s/ Malcolm A. Heinicke

MALCOLM A. HEINICKE

Attorneys for Defendant

WELLS FARGO ADVISORS, LLC

FILER'S ATTESTATION

Pursuant to Local Rule 5-1(i)(3), regarding signatures, I attest that concurrence in the filing of the document has been obtained from each of the other signatories listed above.

1 **[PROPOSED] ORDER**

2 Pursuant to the Parties' Joint Stipulation, it is hereby ORDERED that the case  
3 deadlines in this matter be continued as follows:

4 <b>Case Event</b>	<b>Current Filing Deadline/Hearing Date</b>	<b>Proposed Extended Filing Deadline/Hearing Date</b>
5 Filing of Motion re: 6 Class Certification	2/9/2017	7/28/2017
7 Last hearing date for 8 dispositive motions 9 and/or further case 10 management conference	5/4/2017, at 9:30a.m.	10/26/2017, at 9:30a.m.
11 Meet and confer re 12 pretrial filings	7/28/2017	12/7/2017
13 Pretrial filings due	8/10/2017	12/21/2017
14 Oppositions, Objections, 15 Exhibits, and Depo 16 Designations due	8/24/2017	1/18/2018
17 Final Pretrial 18 Conference	9/28/2017, at 1:30 p.m.	<del>2/3/2018</del> , at 1:30 p.m. 02/01/2018
19 Trial	10/10/2017, at 8:30 a.m.	2/12/2018, at 8:30 a.m.

20 It is so ordered as modified.

21 Date: 02/22/2017

22   
23 HONORABLE LAUREL BEELER