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8 Attorneys for Plaintiff  
 RIMANPREET UPPAL

9 UNITED STATES DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA

12 RIMANPREET UPPAL, an Individual,  
 Individually and on behalf of all others  
 13 similarly situated and the general public,,

14 Plaintiff,

15 v.

16 CVS PHARMACY, INC., a Rhode Island  
 corporation; CVS RX SERVICES, INC., a  
 17 New York corporation; GARFIELD BEACH  
 CVS, LLC, a California limited liability  
 18 company; and DOES 1 thru 50, inclusive,

19 Defendants.

Case No. 3:14-cv-02629-VC

Hon. Vince Chhabria

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO CONTINUE CASE  
 MANAGEMENT CONFERENCE AND  
 RELATED DEADLINES, AND TO  
 STAY PLAINTIFF'S MOTION TO  
 REMAND AND DEFENDANTS' TIME  
 TO RESPOND AS MODIFIED**

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 STIPULATION AND [PROPOSED] ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE AND RELATED DEADLINES,  
 AND TO STAY PLAINTIFF'S MOTION TO REMAND AND DEFENDANTS' TIME TO RESPOND

CASE NO. 3:14-CV-02629-VC

1 **STIPULATION**

2 WHEREAS, counsel for Plaintiff Rimanpreet Uppal also represents the named plaintiffs  
3 in four other separate, but related class action cases: *Sharobiem v. CVS Pharmacy, Inc.*, Case No.  
4 CV 13-9426-GHK; *Bystrom v. CVS Pharmacy, Inc.*, Case No. CV 13-09424-GHK; *Paksy v. CVS*  
5 *Pharmacy, Inc.*, Case No. CV 13-09425-GHK; and *Connell v. CVS Pharmacy, Inc.*, No. CV 13-  
6 09410-GHK.

7 WHEREAS, pursuant to the stipulation of the Parties, the Court previously stayed  
8 Plaintiff's pending Motion to Remand and Defendants' time to respond to said motion in this  
9 matter.

10 WHEREAS, the Parties have agreed to a mediation of this matter and other related cases,  
11 including *Sharobiem v. CVS Pharmacy, Inc.*, Case No. CV 13-9426-GHK; *Bystrom v. CVS*  
12 *Pharmacy, Inc.*, Case No. CV 13-09424-GHK; *Paksy v. CVS Pharmacy, Inc.*, Case No. CV 13-  
13 09425-GHK; and *Connell v. CVS Pharmacy, Inc.*, No. CV 13-09410-GHK, which has been  
14 scheduled for November 14, 2014 in San Francisco with mediator Mark S. Rudy, Esq.

15 WHEREAS, the Ninth Circuit has not yet rendered a decision regarding Defendants'  
16 petition for permission to appeal the Central District's orders granting remand in *Connell*,  
17 *Bystrom*, and *Paksy*.

18 WHEREAS, the Parties seek to seek to resolve the issue of this case's removal efficiently  
19 and without unnecessary expenditure of the Court's resources.

20 THEREFORE, IT IS HEREBY STIPULATED, by the Parties and their respective counsel  
21 of record:

22 That the Initial Case Management Conference presently set for September 16, 2014 at  
23 10:00 a.m. be continued to a date sixty days after the November 14, 2014, and that all  
24 corresponding deadlines provided by the Federal Rules of Civil Procedure, the Civil Local Rules  
25 of the United States District Court for the Northern District of California, and the Court's Order  
26 Setting Initial Case Management Conference (Dkt. No. 7) be continued accordingly;

27 That Plaintiff's motion to remand, and Defendants' corresponding time to oppose  
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**ATTESTATION**

I hereby attest that the concurrence in the filing of this document has been obtained from Michael D. Weil, of Orrick, Herrington & Sutcliffe LLP, Attorneys for Defendants.

Dated: September 8, 2014

SCHONBRUN, DESIMONE, SELOW,  
HARRIS & HOFFMAN LLP

By:           / s/ Michael D. Seplow            
MICHAEL D. SELOW

Attorney for Plaintiff  
RIMANPREET UPPAL

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**~~PROPOSED~~ ORDER AS MODIFIED**

The case management conference is rescheduled to January 13, 2015, at 10:00 a.m. A joint case management conference statement is due no later than January 6, 2015.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATE: \_\_\_September 10, 2014\_\_\_\_\_



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Hon. Vince Chhabria