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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  
 17 SERVICES, INC., a New York  
 corporation; GARFIELD BEACH CVS,  
 18 LLC, a California limited liability  
 company; and DOES 1 thru 50,  
 19 inclusive,  
 20

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  
 DEFENDANTS' TIME TO  
 RESPOND**

AS MODIFIED

1 **STIPULATION**

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

7 WHEREAS, pursuant to the previous stipulations of the Parties, the Court  
8 stayed Plaintiff's pending Motion to Remand and Defendants' time to respond to  
9 said motion in this matter in light of Defendants' having filed petitions with the  
10 United States Court of Appeals for the Ninth Circuit requesting permission to  
11 appeal the Central District's remand orders in Paksy (Case No. 14-80047), Bystrom  
12 (Case No. 14-80048), and Connell (Case No. 14-80049).

13 WHEREAS, the Ninth Circuit has granted Defendants' petition for  
14 permission to appeal the Central District's orders granting remand in Connell,  
15 Bystrom, and Paksy, and has advised that the matters shall be calendared for oral  
16 argument during the week of March 16, 2015.

17 WHEREAS, the Parties agree that the Ninth Circuit's decision regarding  
18 Defendants' appeals the Central District's orders granting remand in Connell,  
19 Bystrom, and Paksy will likely be dispositive with respect to Plaintiff's motion to  
20 remand in the present action.

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

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

25 That the Initial Case Management Conference presently set for January 13,  
26 2015 at 10:00 a.m. be continued to a date sixty days after the March 16, 2015, and  
27 that all corresponding deadlines provided by the Federal Rules of Civil Procedure,  
28

1 the Civil Local Rules of the United States District Court for the Northern District of  
2 California, and the Court's Order Setting Initial Case Management Conference  
3 (Dkt. No. 7) be continued accordingly;

4 That Plaintiff's motion to remand, and Defendants' corresponding time to  
5 oppose Plaintiff's motion, be stayed for sixty days after the March 16, 2015 oral  
6 argument before the Ninth Circuit on the Connell, Bystrom, and Paksy matters;

7 That this Stipulation be accepted as the Parties' further status report  
8 contemplated by the Parties previous stipulation and the Court's order thereon.

9 IT IS SO STIPULATED.

10  
11 Dated: January 2, 2015

TIMOTHY J. LONG  
MICHAEL D. WEIL  
ORRICK, HERRINGTON &  
SUTCLIFFE LLP

14 By: /S/ Michael D. Weil  
MICHAEL D. WEIL

16 Attorney for Defendants  
CVS PHARMACY, INC., CVS RX  
17 SERVICES, INC., and GARFIELD  
BEACH CVS, LLC

18  
19 Dated: January 2, 2015

V. JAMES DESIMONE  
MICHAEL D. SEPLOW  
SCHONBRUM DESIMONE SEPLOW  
HARRIS & HOFFMAN LLP

22 By: /S/ Michael D. Seplow  
MICHAEL D. SEPLOW

24 Attorney for Plaintiff  
RIMANPREET UPPAL

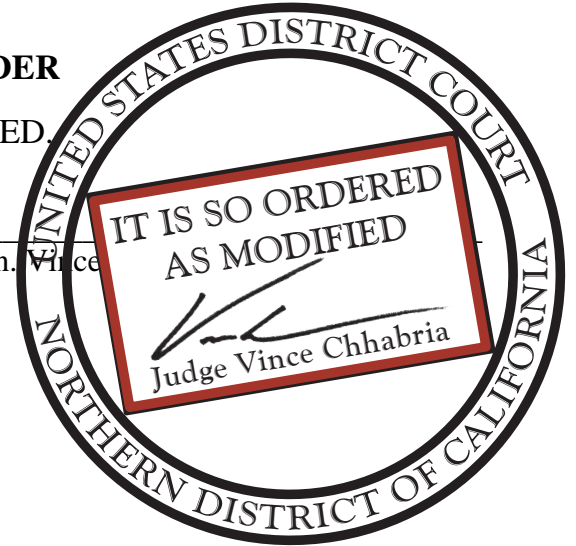
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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATE: January 5, 2015

Hon. Vince



The case management conference is rescheduled to May 12, 2015. The joint case management statement is due 7 days before the conference.