

1 HOFFMAN EMPLOYMENT LAWYERS
2 MICHAEL HOFFMAN (SBN 154481)
3 LEONARD EMMA (SBN 224483)
4 STEPHEN NOEL ILG (SBN 275599)
5 580 California Street, Suite 1600
6 San Francisco, CA 94104
7 Tel (415) 362-1111
8 Fax (415) 362-1112
9 Email: mhoffman@employment-lawyers.com
10 Email: lemma@employment-lawyers.com
11 Email: silg@employment-lawyers.com

12 Attorneys for Plaintiff PAULA DONALD

13 MARK POSARD (SBN: 208790)
14 mposard@gordonrees.com
15 MOLLIE BURKS (SBN: 222112)
16 mburks@gordonrees.com
17 SARA A. MOORE (SBN: 294255)
18 smoore@gordonrees.com
19 GORDON & REES LLP
20 275 Battery Street, Suite 2000
21 San Francisco, CA 94111
22 Telephone: (415) 986-5900
23 Facsimile: (415) 986-8054

24 Attorneys for Defendant
25 XANITOS, INC.

26 Attorneys for Defendant XANITOS, INC.
27 and KAISER FOUNDATION HOSPITALS

28 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PAULA DONALD, on behalf of herself,
all others similarly situated, and the general
public,

Plaintiff,

vs.

XANITOS, INC., a Delaware corporation,
KAISER FOUNDATION HOSPITALS, a
California corporation, and DOES 1
through 10, inclusive,

Defendants.

Case No. 3:14-cv-05416-WHO

PUTATIVE CLASS ACTION

**JOINT STIPULATION AND ORDER TO
CONTINUE CERTIFICATION
DEADLINES**

1 Pursuant to Civil Local Rule 7-12 of the United States District Court for the Northern
2 District of California, the Parties to the above entitled action, Plaintiff PAULA DONALD
3 (“Plaintiff,”), Defendant XANITOS, INC. (“Xanitos”), and Defendant KAISER FOUNDATION
4 HOSPITALS (“Kaiser”) (collectively referred to as the “Parties”), by and through their
5 undersigned counsel, enter into the following Stipulation:

6 WHEREAS, the Plaintiff and Defendant Xanitos have each diligently propounded and
7 responded to a first set of written discovery and are presently meeting and conferring regarding
8 responses as well as scheduling pre-certification depositions;

9 WHEREAS, the Court granted Plaintiff’s Motion for Leave to amend to add a new claim
10 and a new Defendant, KAISER FOUNDATION HOSPITALS (“Kaiser”) as an alleged joint
11 employer;

12 WHEREAS, Plaintiff filed a First Amended Complaint adding Kaiser on April 23, 2015;

13 WHEREAS, the addition of Kaiser as a party has caused delays due to the volume of
14 discovery, the amount of time required for Kaiser to compile responsive information, and the
15 time required for the Parties to meet and confer regarding the same;

16 WHEREAS the Parties have met and conferred regarding a stipulation to modify the
17 schedule in light of the delays caused by the addition of Kaiser as a new Defendant;

18 WHEREAS no other modifications to the case schedule have been made in this matter;

19 WHEREAS, the Parties agree it would be appropriate to continue the deadlines for
20 Plaintiff’s Motion for Class Certification and Defendant’s Opposition thereto for approximately
21 six (6) months to complete necessary pre-certification discovery;

22 NOW THEREFORE, the Parties stipulate to continue, for six (6) months, the deadlines
23 for Plaintiff’s Motion for Class Certification and Defendant’s Opposition thereto:

24 1. Plaintiff’s deadline to file a Motion for Class Certification is continued for
25 approximately six (6) months, to March 15, 2016.

26 2. Deadline to file an Opposition to Plaintiff’s Motion for Class Certification is
27 continued for approximately six (6) months, to April 1, 2016.

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IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED: July 29, 2015

GORDON REES LLP

/s/ Sara Moore

By _____

Mark Posard

Sara Moore

Attorneys for Defendant

XANITOS, INC. AND KAISER FOUNDATION
HOSPITALS, INC.

DATED: July 29, 2015

HOFFMAN EMPLOYMENT LAWYERS

/s/ Stephen Noel Ilg

BY _____

Michael Hoffman

Leonard Emma

Stephen Noel Ilg

Attorneys for Plaintiffs

PAULA DONALD *et al.*

I, Stephen Noel Ilg, hereby attest, pursuant to N.D. Cal. Local Rule 5-1(i)(3), that concurrence to the filing of this document has been obtained from each signatory.

By: /s/ Stephen Noel Ilg

Attorneys for Plaintiffs

PAULA DONALD *et al.*

PURSUANT TO STIPULATION, as modified, IT IS ORDERED AS

FOLLOWS:

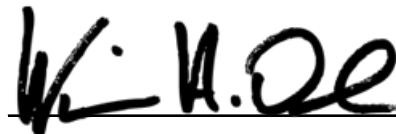
1. Plaintiff's deadline to file a Motion for Class Certification is continued for approximately six (6) months, to March 15, 2016.
2. Defendant's deadline to file an Opposition to Plaintiff's Motion for Class Certification is continued for approximately six (6) months, to April 1, 2016.
3. **Plaintiff's deadline to file a Reply to the Opposition is April 15, 2016.**
4. **Hearing on the motion for class certification is set for 2 pm on May 4, 2016, in Courtroom 2, 17th floor.**

Given that this is a lengthy continuance from a schedule initially proposed by the parties, no further extensions to this schedule are contemplated.

A further Case Management Conference is set for January 5, 2016 at 2 pm in Courtroom 2, 17th floor. The Joint Statement is due no later than December 29, 2015.

IT IS SO ORDERED.

Dated: August 3, 2015



United States District Judge