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 11 PGA TOUR, Inc.

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 13 **UNITED STATES DISTRICT COURT**
 14 **NORTHERN DISTRICT OF CALIFORNIA**
 15 **SAN FRANCISCO DIVISION**

16 WILLIAM MICHAEL HICKS and
 KENNETH HARMS, as Class Representative
 17 Plaintiffs, et al.

CASE NO. 3:15-cv-00489-VC

**STIPULATION AND ~~PROPOSED~~
 ORDER**

18 Plaintiffs,

19 v.

20 PGA TOUR, INC.

21 Defendants.

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1 Plaintiffs William Michael Hicks and Kenneth Harms, as Class Representative Plaintiffs, et
2 al. (collectively, the “Plaintiffs”) and Defendant PGA TOUR, INC. (the “TOUR”), through their
3 respective counsel, hereby stipulate and agree as follows:

4 WHEREAS Plaintiffs filed the Complaint in this action on February 3, 2015;

5 WHEREAS service of the Complaint, Summons, and supporting documents was effected
6 on or about February 11, 2015;

7 WHEREAS, the TOUR has informed Plaintiffs that it intends to move to transfer venue in
8 this action to the Middle District of Florida;

9 WHEREAS, the parties have agreed that the TOUR’s time to answer, move, or otherwise
10 plead in response to the Complaint shall be extended through resolution of the TOUR’s
11 forthcoming motion to transfer venue;

12 WHEREAS, Plaintiffs reserve the right to seek (and the TOUR reserves the right to oppose)
13 discovery in connection with the TOUR’s motion to transfer venue, which discovery, if permitted,
14 would affect any briefing schedule on such motion;

15 IT IS HEREBY STIPULATED AND AGREED that, pursuant to Civil Local Rule 6-1:

16 1. On or before March 6, 2015, the TOUR will move to transfer venue in this action to
17 the Middle District of Florida;

18 2. Promptly after the filing of the TOUR’s motion to transfer venue, the parties (a) will
19 meet-and-confer regarding whether any venue-related discovery is necessary, and to set a proposed
20 briefing schedule for the motion to transfer, and (b) shall submit a proposed schedule to the Court;
21 and

22 3. The TOUR will answer, move, or otherwise plead in response to the Complaint
23 within 30 days of the entry of an order on its motion to transfer venue;

24 IT IS FURTHER STIPULATED AND AGREED that this Stipulation does not constitute a
25 waiver of any other defense including, but not limited to, the defenses of lack of personal or subject
26 matter jurisdiction or improper venue.

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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: February 23, 2015



The Honorable Vince Chhabria
United States District Court Judge