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29 ***Attorneys for Class Representative***
 30 ***Plaintiffs, William Michael Hicks and***
 31 ***Kenneth Harms, et. al.***

32 UNITED STATES DISTRICT COURT
 33 NORTHERN DISTRICT OF CALIFORNIA
 34 SAN FRANCISCO DIVISION

35 William Michael Hicks and Kenneth
 36 Harms, as Class Representative Plaintiffs,
 37 *et. al*
 38 Plaintiffs,
 39 vs.
 40 PGA TOUR, Inc.,
 41 Defendant.

Case No. 3:15-cv-00489-VC

**STIPULATION AND ~~(PROPOSED)~~
 ORDER**

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

4 WHEREAS Plaintiffs filed their original complaint in this matter on February 3, 2015;

5 WHEREAS service of Plaintiffs’ original complaint, summons, and supporting documents
6 was effected on or about February 11, 2015;

7 WHEREAS this Court, based on the parties’ previous stipulation [Doc. No. 16], extended
8 the deadlines for Defendant’s initial responsive pleadings;

9 WHEREAS Defendant filed its Motion to Change Venue [Doc. No. 25] on March 5, 2015;

10 WHEREAS Plaintiffs filed an Amended Complaint [Doc. No. 28] on March 16, 2015;

11 WHEREAS Defendant may seek to supplement its motion to transfer venue to address the
12 parties and allegations added to the First Amended Complaint;

13 WHEREAS Plaintiffs intend to seek venue discovery and resolve venue discovery disputes
14 before Plaintiffs’ response to Defendant’s Motion to Change Venue becomes due and before
15 briefing is complete on Defendant’s Motion to Change Venue;

16 WHEREAS the parties have previously agreed that such discovery, which Defendant has
17 reserved the right to oppose, would affect any briefing schedule on Defendant’s Motion to Change
18 Venue.

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

20 1. Plaintiffs’ deadline to file a response to Defendant’s Motion to Change Venue will
21 be adjourned pending completion of venue discovery and resolution of venue discovery disputes,
22 if any;

23 2. On or before March 25, 2015 Plaintiffs will serve Defendant with venue discovery
24 requests limited to issues related to Defendant’s Motion to Change Venue;

25 3. Upon service of Plaintiffs’ discovery requests and Defendant’s responses and
26 objections, the parties will promptly meet and confer regarding the scope of Plaintiffs’ requests,
27 the scheduling of any response to those requests, Defendant’s objections and claims of privilege,
28 and all other matters relating to Plaintiffs’ requests;

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PROPOSED ORDER

~~PURSUANT TO STIPULATION, IT IS SO ORDERED.~~

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Dated: March 19, 2015

The Honorable
United States District Judge

The proposed stipulation is denied.
The parties should submit a revised stipulation
that includes a due date for the opposition to the
transfer motion and a date for the hearing on that motion.

