Pettit v. Procter & Gamble Company

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Pursuant to Civil L.R. 6-1(b), 6-2, and 7-12, plaintiff Jamie Pettit and defendant The Procter & Gamble Company ("P&G") respectfully submit this joint stipulation to adjust the opposition and reply deadlines related to plaintiff's motion for class certification.

WHEREAS, at the August 13, 2015 Case Management Conference and in a subsequent order, this Court set an initial briefing schedule for plaintiff's motion for class certification (see Dkt. No. 24);

WHEREAS, the parties filed joint stipulations on four subsequent occasions to extend the schedule for class certification, each of which was entered by the Court (see Dkt. Nos. 27, 29, 31 and 41);

WHEREAS, the last such stipulation (see Dkt. No. 41) was entered on August 29, 2016 and provided that plaintiff would file her motion for class certification by February 14, 2017; P&G would file its opposition by March 28, 2017; plaintiff would file her reply by April 25, 2017; and the hearing would be held at 1:30 p.m. on May 18, 2017.

WHEREAS, plaintiff timely filed her motion for class certification on February 14, 2017; WHEREAS, to accommodate the parties' agreed-upon schedule to depose various individuals, including the named plaintiff and the parties' class certification experts, and for P&G to provide certain supplemental discovery on which the parties have agreed, the parties propose to add three days to both the opposition and reply periods, but leave unchanged the hearing date.

NOW THEREFORE, THE PARTIES BY COUNSEL HEREBY STIPULATE as follows:

P&G shall provide certain agreed-upon supplemental discovery to plaintiff by March 17, 2017; P&G shall file its opposition to plaintiff's motion for class certification by March 31, 2017; P&G shall make available for deposition the week of April 17 any experts whose declarations are submitted in opposition to class certification; plaintiff shall file her reply by May 2, 2017, and the hearing shall remain on calendar for 1:30 p.m. on May 18, 2017, or another date convenient for the Court.

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1	DATED: March 8, 2017	COVINGTON & BURLING LLP
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3		By: <u>/s/ Cortlin H. Lannin</u> Cortlin H. Lannin
4		Attorneys for Defendant
5		The Procter & Gamble Company
6	DATED: March 8, 2017	GUTRIDE SAFIER LLP
7		
8		By: /s/ Adam Gutride Adam Gutride
9		Attorneys for Plaintiff
10		Anorneys for 1 tunniff
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13		ATION, AND FOR GOOD CAUSE SHOWN, THE
14	COURT ORDERS AS FOLLOWS:	
15	P&G shall provide certain agreed-upon supplemental discovery to plaintiff by March 17,	
16	2017; P&G shall file its opposition to plain	ntiff's motion for class certification by March 31, 2017; P&G
17	shall make available for deposition the week of April 17 any experts whose declarations are submitted in	
18	opposition to class certification; plaintiff sl	hall file her reply by May 2, 2017, and the hearing shall
19	remain on calendar for 1:30 p.m. on May 1	8, 2017, or another date convenient for the Court.
20		-0110.
21	DATED: <u>3/8/17</u>	This Section
22	DATED. <u>370717</u>	THE HONORABLE RICHARD SEEBORG
		UNITED STATES DISTRICT JUDGE
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