1 2 3 4 5 6 7 8 9	DUCKWORTH PETERS LEBOWITZ OLIV Monique Olivier (SBN 190385) (monique@dplolaw.com) 100 Bush Street, Suite 1800 San Francisco, CA 94104 Telephone: (415) 433-0333 Facsimile: (415) 449-6556 KOSINSKI + THIAGARAJ, LLP Alison Kosinski (SBN 261676) (alison@ktlawsf.com) Emily Thiagaraj (SBN 284634) (emily@ktlawsf.com) 351 California Street, Suite 300 San Francisco, California 94104	IER LLP		
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11	Attorneys for Plaintiff and the Putative Class			
12	Additional Counsel on Following Page			
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14				
15	UNITED STATES DISTRICT COURT			
16	NORTHERN DISTRICT OF CALIFORNIA			
17				
18	JULIA BERNSTEIN, LISA MARIE SMITH, and ESTHER GARCIA, on behalf of	Case No. 15-cv-02277-JST		
19	themselves and all others similarly situated,	JOINT STIPULATION REGARDING REBUTTAL EXPERT DISCLOSURE IN		
20	Plaintiffs,	CONNECTION WITH PLAINTIFFS'		
21	VS.	MOTION FOR CLASS CERTIFICATION;		
22	VIRGIN AMERICA, INC.; and Does 1-10, inclusive;	[PROPOSED] ORDER THEREON		
23	Defendants.			
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MORGAN, LEWIS & BOCKIUS LLP Attorneys at Law San Francisco DB2/ 30482995.1	1	JOINT STIPULATION; [PROPOSED] ORDER THEREON CASE NO. 15-CV-02277-JST		

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MORGAN, LEWIS & BOCKIUS LLP Attorneys at Law San Francisco	2 JOINT STIPULATION; [PROPOSED] ORDER THEREON CASE NO. 15-CV-02277-JST

1		STIPULATION		
2	Plaintiffs Julia Bernstein, et al. ("Plaintiffs") and Defendant Virgin America, Inc.			
3	("Defendant") (collectively, the "Parties"), through their counsel, hereby stipulate and agree that:			
4	WHEREAS the last day for the Parties to disclose rebuttal experts in connection with			
5	Plaintiffs' Motion for Class Certification is currently August 8, 2016 (ECF 37);			
6	WHEREAS the Plaintiffs' expert, David Breshears, was deposed on July 27, 2016. That			
7	deposition was not completed and is set to be completed on August 9, 2016;			
8	WHEREAS based on the foregoing, the Parties respectfully request that the Court			
9	continue the deadline for Defendant to disclose rebuttal expert(s) in connection with Plaintiffs'			
10	Motion for Class Certification to August 19, 2016.			
11				
12	NOW, THEREFORE, the Parties, through their respective counsel, hereby stipulate,			
13	subject to the approval of the Court, to the following schedule:			
14	August 19, 2016 Last day for Defendant to disclose rebuttal expert(s) in connection with Plaintiffs' Motion for Class Certification			
15				
16				
17	Dated: August 3, 2016	DUCKWORTH F	PETERS LEBOWITZ OLIVIER LLP	
18		By: <u>/s/ Monique</u> Monique Oliv	Olivier	
19		Monique Oliv Attorneys for	ier Plaintiffs	
20				
21	Dated: August 3, 2016	MORGAN LEWI	S & BOCKIUS	
22		By: <u>/s/ Nancy Vil</u> Robert Jon He	larreal	
23		Nancy Villarre	eal	
24		Attorneys for 1	Defendant	
25	*I, Nancy Villarreal, attest that Monique Olivier has concurred in the filing of this document.			
26	(L.R. 5-1(i).)			
27				
28 Morgan, Lewis &			JOINT STIPULATION;	
BOCKIUS LLP Attorneys at Law San Francisco		3	[PROPOSED] ORDER THEREON CASE NO. 15-CV-02277-JST	

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2	[PROPOSED] ORDER		
3	Pursuant to the stipulation of the Parties, and good cause appearing, the new deadline for		
4	Defendant to disclose rebuttal expert(s) in connection with Plaintiffs' Motion for Class		
5	Certification is August 19, 2016.		
6			
7	IT IS SO ORDERED.		
8			
9	DATED: August 3, 2016		
10	Hor. Jon S. Tigar United States District Judge		
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28 Morgan, Lewis &	JOINT STIPULATION;		
BOCKIUS LLP Attorneys at Law San Francisco	4 [PROPOSED] ORDER THEREON CASE NO. 15-CV-02277-JST		