

1 Laurence D. King (SBN 206423)
 Linda M. Fong (SBN 124232)
 2 Matthew B. George (SBN 239322)
 Mario M. Choi (SBN 243409)
 3 **KAPLAN FOX & KILSHEIMER LLP**
 350 Sansome Street, Suite 400
 4 San Francisco, CA 94104
 Telephone: 415-772-4700
 5 Facsimile: 415-772-4707
 lking@kaplanfox.com
 6 lfong@kaplanfox.com
 mgeorge@kaplanfox.com
 7 mchoi@kaplanfox.com

8 Frederic S. Fox (admitted *pro hac vice*)
 Donald R. Hall (admitted *pro hac vice*)
 9 **KAPLAN FOX & KILSHEIMER LLP**
 850 Third Avenue, 14th Floor
 10 New York, NY 10022
 Telephone: 212-687-1980
 11 Facsimile: 212-687-7714
 ffox@kaplanfox.com
 12 dhall@kaplanfox.com

13 *Attorneys for Plaintiff COLLEEN GALLAGHER*

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

18 COLLEEN GALLAGHER, Individually
 and on Behalf of All Others Similarly
 19 Situated,

20 Plaintiff,

21 v.

22 CHIPOTLE MEXICAN GRILL, INC., a
 Delaware Corporation,

23 Defendant.

Case No. 3:15-cv-03952-HSG

**STIPULATION AND ORDER RE:
 FILING OF FIRST AMENDED
 COMPLAINT AND RELATED BRIEFING
 SCHEDULE**

Judge: Hon. Haywood S. Gilliam, Jr.
 Courtroom: 15, 18th Floor
 Date: June 2, 2016
 Time: 2:00 p.m.

24
25
26
27
28
Case No. 3:15-cv-03952-HSG

STIPULATION AND ~~PROPOSED~~ ORDER RE: FILING OF FIRST AMENDED COMPLAINT AND RELATED BRIEFING SCHEDULE

STIPULATION

WHEREAS, on February 5, 2016, the Court issued an Order dismissing Plaintiff's initial Complaint without prejudice and giving Plaintiff until February 26, 2016 to file a First Amended Complaint ("FAC");

WHEREAS, one of the principal attorneys for Plaintiff became the father of twins in the last several days and will therefore be out of the office for several weeks;

WHEREAS, Plaintiff has requested and Defendant has agreed that, subject to the Court's approval, Plaintiff may have a two-week extension to file the First Amended Complaint until March 11, 2016; and

WHEREAS, subject to the Court's approval, the parties have also negotiated a briefing schedule for Defendant's anticipated motion to dismiss the FAC;

IT IS HEREBY STIPULATED AND AGREED that, subject to the Court's approval, the schedule for the filing of the FAC and the briefing and hearing of any motion to dismiss filed in response thereto, shall be as follows:

EVENT	DATE
Filing of the FAC	March 11, 2016
Filing of Motion to Dismiss	April 8, 2016
Filing of Opposition to Motion to Dismiss	May 5, 2016
Filing of Reply to Opposition to Motion to Dismiss	May 19, 2016
Hearing re Motion to Dismiss.....	June 2, 2016

SO STIPULATED:

DATED: February 22, 2016

KAPLAN FOX & KILSHEIMER LLP

By: /s/ Laurence D. King
Laurence D. King

Laurence D. King (SBN 206423)
Linda M. Fong (SBN 124232)
Matthew B. George (SBN 239322)
Mario M. Choi (SBN 243409)
350 Sansome Street, Suite 400
San Francisco, CA 94104
Telephone: 415-772-4700
Facsimile: 415-772-4707

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

KAPLAN FOX & KILSHEIMER LLP
Frederic S. Fox (admitted *pro hac vice*)
Donald R. Hall (admitted *pro hac vice*)
850 Third Avenue, 14th Floor
New York, NY 10022
Telephone: 212-687-1980
Facsimile: 212-687-7714

Attorneys for Plaintiff COLLEEN GALLAGHER

DATED: February 22, 2016

MESSNER REEVES LLP

By: /s/ Charles C. Cavanagh
Charles C. Cavanagh

Charles C. Cavanagh (SBN 198468)
Allison Dodd (pro hac vice)
1430 Wynkoop Street, Suite 300
Denver, CO 80202
Telephone: 303-623-1800
Facsimile: 303-623-0552
ccavanagh@messner.com
adodd@messner.com

SHEPPARD, MULLIN, RICHTER &
HAMPTON, LLP
Sascha Henry (SBN 191914)
333 South Hope Street, 43rd Floor
Los Angeles, CA 90071
Telephone: 213-620-1780
Facsimile: 213-620-1398
shenry@sheppardmullin.com

*Attorneys for Defendant CHIPOTLE MEXICAN
GRILL, INC*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

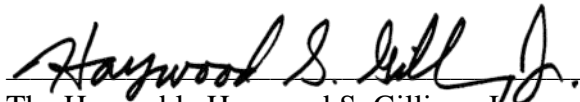
For good cause shown, **IT IS HEREBY ORDERED:**

The schedule for the filing of the FAC, and the briefing and hearing of any motion to dismiss filed in response thereto, shall be as follows:

EVENT	DATE
Filing of the FAC	March 11, 2016
Filing of Motion to Dismiss	April 8, 2016
Filing of Opposition to Motion to Dismiss	May 5, 2016
Filing of Reply to Opposition to Motion to Dismiss	May 19, 2016
Hearing re Motion to Dismiss.....	June 2, 2016

SO ORDERED.

DATED: February 25, 2016



 The Honorable Haywood S. Gilliam, Jr.
 United States District Judge