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Attorneys for Plaintiff SHAON ROBINSON

12 **UNITED STATES DISTRICT COURT**  
 13 **NORTHERN DISTRICT OF CALIFORNIA**

14 SHAON ROBINSON, SEAN CLARK, on  
 15 behalf of themselves, all others similarly  
 16 situated, and the general public,

Plaintiff,

vs.

17 THE CHEFS' WAREHOUSE, INC., a  
 18 Delaware corporation, THE CHEFS'  
 19 WAREHOUSE WEST COAST, LLC, a  
 20 California limited liability company, and  
 21 DOES 1 through 100, inclusive,

Defendants.

Case No. 15-cv-05421

ORDER

**JOINT STIPULATION TO EXTEND  
 EXPERT DEADLINES**

**HOFFMAN EMPLOYMENT LAWYERS**  
 580 California Street, Ste. 1600  
 San Francisco, CA 94104  
 (415) 362-1111

1 Plaintiffs SHAON ROBINSON and SEAN CLARK, on behalf of themselves and all  
2 others similarly situated, (“Plaintiffs”) and THE CHEFS’ WAREHOUSE, INC. and THE  
3 CHEFS’ WAREHOUSE WEST COAST, LLC (“Defendants”) (collectively, the “Parties”), by  
4 and through their respective counsel of record, hereby stipulate and agree as follows:

5 WHEREAS, on March 24, 2016, the Court entered a Case Management Scheduling  
6 Order (Dkt. 20) (the “Order”).

7 WHEREAS, the Order set forth the following deadlines:

- 8 • On or before March 3, 2017, parties will designate experts in accordance with  
9 Federal Rule of Civil Procedure 26(a)(2).
- 10 • On or before March 17, 2017, parties will designate their supplemental and  
11 rebuttal experts in accordance with Federal Rule of Civil Procedure 26(a)(2).
- 12 • On or before April 28, 2017, all discovery of expert witnesses pursuant to  
13 Federal Rule of Civil Procedure 26(b)(4) shall be completed.

14 WHEREAS, based on the current Order, Plaintiffs’ motion for class certification shall be  
15 heard on September 21, 2017.

16 WHEREAS, the Parties are engaged in fact discovery disputes and mutually agree it  
17 would be beneficial and a conservation of time and resources to conduct further fact discovery,  
18 resolve outstanding fact discovery disputes that may impact the production of contact  
19 information and documents (including time records and wage statements) for putative class  
20 members, and obtain a ruling on class certification before exchanging expert-related disclosures.

21 WHEREAS, this is the Parties’ first stipulation to extend expert discovery deadlines.

22 **NOW, THEREFORE, IT IS HEREBY STIPULATED** between the Parties, by and  
23 through their respective attorneys of record, subject to an order of the Court, that expert-related  
24 deadlines be continued as set forth below:

- 25 • October 23, 2017, parties will designate experts in accordance with Federal  
26 Rule of Civil Procedure 26(a)(2).

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- November 6, 2017, parties will designate their supplemental and rebuttal experts in accordance with Federal Rule of Civil Procedure 26(a)(2).
- December 18, 2017, all discovery of expert witnesses pursuant to Federal Rule of Civil Procedure 26(b)(4) shall be completed.

**IT IS SO STIPULATED.**

Respectfully submitted,

Dated: March 2, 2017

HOFFMAN EMPLOYMENT LAWYERS

/s/ Stephen Noel Ilg

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Stephen Noel Ilg  
Attorneys for SHAON ROBINSON and SEAN CLARK on behalf of themselves, all others similarly situated, and the general public

Dated: March 2, 2017

REED SMITH LLP

/s/ Julia Y. Trankiem

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Julia Y. Trankiem  
Attorneys for THE CHEFS' WAREHOUSE WEST COAST, LLC, erroneously sued as THE CHEFS' WAREHOUSE, INC.

**Attestation**

Pursuant to Northern District L.R. 5-1(i)(3) regarding signatures, I hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

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/s/ Stephen Noel Ilg  
STEPHEN NOEL ILG  
HOFFMAN EMPLOYMENT LAWYERS  
Attorneys for Plaintiffs

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 3/3/17



RICHARD SEEBORG  
UNITED STATES DISTRICT JUDGE