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10 Attorneys for Defendant  
 SEAGATE TECHNOLOGY LLC

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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

EVERETT CASTILLO, LINDA CASTILLO,  
 NICHOLAS DATTOMA, FREDA LANG,  
 WENDY TRAN, and STEVEN WILK,  
 individually and on behalf of all others similarly  
 situated,

Plaintiffs,

v.

SEAGATE TECHNOLOGY LLC,

Defendant.

Case No. 3:16-cv-01958-RS

**STIPULATION AND [PROPOSED]  
 ORDER CONTINUING  
 PLAINTIFFS' TIME TO FILE  
 AMENDED COMPLAINT**

Judge: Hon. Richard Seeborg  
 Action Filed: April 14, 2016

1 Pursuant to Local Rules 6-2 and 7-12, Plaintiffs EVERETT CASTILLO, LINDA  
2 CASTILLO, NICHOLAS DATTOMA, FRED A LANG, WENDY TRAN, and, STEVEN  
3 WILK (“Plaintiffs”), on behalf of themselves and all others similarly situated, and Defendant  
4 Seagate Technology LLC (“Seagate”), through their undersigned counsel, hereby stipulate as  
5 follows:

6 WHEREAS, on June 15, 2016, the Court granted the parties’ stipulation to consolidate  
7 the following two actions : *Castillo et al. v. Seagate Technology LLC*, No. 3:16-cv-01958-RS  
8 (filed on April 14, 2016) and *Dattoma v. Seagate Technology LLC*, No. C5:16-cv-02136-RS  
9 (filed on April 21, 2016) (Dkt. No. 19);

10 WHEREAS, Plaintiffs filed their Consolidated Class Action Complaint on June 28, 2016  
11 (Dkt. No. 22);

12 WHEREAS, Seagate moved to dismiss the Consolidated Class Action Complaint on  
13 July 28, 2016 (Dkt. No. 29);

14 WHEREAS, by order entered September 14, 2016 (Dkt. No. 39), the Court granted in  
15 part and denied in part Seagate’s motion to dismiss, and the Court granted Plaintiff leave to  
16 amend their complaint within 20 days of the order;

17 WHEREAS, Plaintiffs’ deadline to amend the complaint is currently October 4, 2016,  
18 which is the second day of the Rosh Hashana holiday;

19 WHEREAS, on September 29, 2016, counsel for the parties discussed issues related to  
20 Plaintiffs’ anticipated amended complaint and certain information Plaintiff intends to allege that  
21 may need to be filed under seal;

22 WHEREAS, the parties intend to continue their discussions to determine whether  
23 information contained in the anticipated amended complaint should be filed under seal;

24 WHEREAS, the parties have previously requested an order continuing a case  
25 management conference, which was granted on July 6, 2016 (Dkt. No. 28), and a fourteen-day  
26 extension of time to respond to the Complaint filed on April 14, 2016, pursuant to Local Rule 6-  
27 1.

1 WHEREAS, in light of the intervening holiday and in order to efficiently attempt to  
2 resolve any issues concerning confidentiality, plaintiffs have requested, and defendant does not  
3 oppose, an extension of plaintiffs' deadline to file their amended complaint by fourteen (14)  
4 days, through and including October 18, 2016.

5 IT IS HEREBY STIPULATED AND AGREED by the parties, through their counsel,  
6 subject to the approval of the Court, that the October 4, 2016, deadline for plaintiffs' to file their  
7 amended complaint is continued through and including October 18, 2016.

8  
9 Dated: September 30, 2016

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SEAGATE TECHNOLOGY LLC

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: 10/3/16



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The Honorable Richard Seeborg