

1 Michael P. Esser (SBN 268634)
 2 KIRKLAND & ELLIS LLP
 3 555 California Street
 4 San Francisco, CA 94104
 Telephone: (415) 439-1400
 Facsimile: (415) 439-1500
 Email: michael.esser@kirkland.com

Jahan C. Sagafi (Cal. Bar No. 224887)
 OUTTEN & GOLDEN LLP
 One Embarcadero Center, 38th Floor
 San Francisco, CA 94111
 Telephone: (415) 638-8800
 Facsimile: (415) 638-8810
 E-mail: jsagafi@outtengolden.com

5 Emily Nicklin (admitted *pro hac vice*)
 Gabor Balassa (admitted *pro hac vice*)
 6 Christina Breisacher (admitted *pro hac vice*)
 Mark Premo-Hopkins (admitted *pro hac vice*)
 7 KIRKLAND & ELLIS LLP
 8 300 N. LaSalle
 Chicago, IL 60654
 Telephone: (312) 862-2000
 9 Facsimile: (312) 862-2200
 Email: enicklin@kirkland.com
 10 Email: gabor.balassa@kirkland.com
 Email: christina.breisacher@kirkland.com
 11 Email: mark.premohopkins@kirkland.com

[Additional counsel listed on next page]
 Attorneys for Plaintiff and Proposed Class
 and Collective Members

12 Attorneys for Defendant
 13 PRICEWATERHOUSECOOPERS LLP

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

17 STEVE RABIN, *on behalf of himself, and all others*
 18 *similarly situated,*

Case No. 3:16-cv-02276-JST

19 Plaintiff,

Hon. Jon S. Tigar

20 v.

**JOINT STIPULATION & [PROPOSED]
 ORDER TO EXTEND TIME TO FILE
 DECLARATION IN SUPPORT OF
 PLAINTIFFS' ADMINISTRATIVE
 MOTION FOR LEAVE TO FILE
 UNDER SEAL**

21 PRICEWATERHOUSECOOPERS LLP,

22 Defendant.

23
 24
 25
 26
 27
 28 JOINT STIPULATION & [PROPOSED] ORDER
 TO EXTEND TIME TO FILE DECLARATION IN
 SUPPORT OF PLAINTIFFS' ADMINISTRATIVE
 MOTION FOR LEAVE TO FILE UNDER SEAL

CASE No. 3:16-cv-02276-JST

1 Adam T. Klein (admitted *pro hac vice*)
2 Daniel Stromberg (admitted *pro hac vice*)
3 Melissa L. Stewart (admitted *pro hac vice*)
4 OUTTEN & GOLDEN LLP
5 685 Third Avenue, 25th Floor
6 New York, NY 10017
7 Telephone: (212) 245-1000
8 Facsimile: (646) 509-2060
9 Email: atk@outtengolden.com
10 Email: dstromberg@outtengolden.com
11 Email: mstewart@outtengolden.com

12 Daniel Kohrman (admitted *pro hac vice*)
13 Laurie McCann (admitted *pro hac vice*)
14 Dara Smith (admitted *pro hac vice*)
15 AARP FOUNDATION LITIGATION
16 601 E. Street, N.W.
17 Washington, D.C. 20049
18 Telephone: (202) 434-2060
19 Facsimile: (202) 434-2082
20 E-mail: dkohrman@aarp.org
21 E-mail: lmccann@aarp.org
22 E-mail: dsmith@aarp.org

23 Jennifer L. Liu (Cal. Bar No. 279370)
24 THE LIU LAW FIRM, P.C.
25 1390 Market Street, Suite 200
26 San Francisco, CA 94102
27 Telephone: (415) 896-4260
28 Facsimile: (415) 231-0011
E-mail: jliu@liulawpc.com

1 Pursuant to Civil Local Rule 6-1(a), Plaintiffs and Defendant PricewaterhouseCoopers
2 (“PwC”) (collectively, the “Parties”) hereby stipulate as follows:

3 WHEREAS, Plaintiffs filed its Administrative Motion for Leave to File Under Seal Materials
4 Related to Plaintiffs’ Opposition to Defendant PwC’s Motion for Certification Under 28 U.S.C. §
5 1292(b), ECF No. 91, on March 22, 2017;

6 WHEREAS, under the the District’s normal scheduling rules, PwC is required to submit a
7 declaration in support of Plaintiffs’ Administrative Motion for Leave to File Under Seal Materials
8 Related to Plaintiffs’ Opposition to Defendant PwC’s Motion for Certification Under 28 U.S.C. §
9 1292(b) within four days of that motion’s filing;

10 WHEREAS, in light of ongoing briefing on discovery matters and PwC’s Motion for
11 Certification Under 28 U.S.C. § 1292(b), the Parties have conferred and agreed to establish a new
12 schedule for submission of the declaration;

13 WHEREAS, the resulting proposed schedule will not alter the date of any event or any
14 deadline already fixed by Court order;

15 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT, PwC’s
16 deadline to submit a Declaration in Support of Plaintiffs’ Administrative Motion for Leave to File
17 Under Seal Materials Related to Plaintiffs’ Opposition to Defendant PwC’s Motion for Certification
18 Under 28 U.S.C. § 1292(b) is Monday, April 3, 2017.

19
20 Dated: March 28, 2017

21 /s/ Jahan C. Sagafi

/s/ Emily Nicklin

22 Jahan C. Sagafi (Cal. Bar No. 224887)
23 OUTTEN & GOLDEN LLP
24 One Embarcadero Center, 38th Floor
25 San Francisco, CA 94111-3339
26 Telephone: (415) 638-8800
27 Facsimile: (415) 638-8810
28 Email: jsagafi@outtengolden.com

Emily Nicklin (*pro hac vice*)
Gabor Balassa (*pro hac vice*)
Christina Breisacher (*pro hac vice*)
Mark Premo-Hopkins (*pro hac vice*)
KIRKLAND & ELLIS LLP
300 N. LaSalle
Chicago, IL 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Email: enicklin@kirkland.com
Email: gabor.balassa@kirkland.com

Email: christina.briesacher@kirkland.com
Email: mark.premohopkins@kirkland.com

Adam T. Klein (admitted *pro hac vice*)
Daniel Stromberg (admitted *pro hac vice*)
Melissa L. Stewart (admitted *pro hac vice*)
OUTTEN & GOLDEN LLP
685 Third Avenue, 25th Floor
New York, NY 10017
Telephone: (212) 245-1000
Facsimile: (646) 509-2060
Email: atk@outtengolden.com
Email: dstromberg@outtengolden.com
Email: mstewart@outtengolden.com

Michael P. Esser (SBN 268634)
KIRKLAND & ELLIS LLP
555 California Street
San Francisco, CA 94104
Telephone: (415) 439-1400
Facsimile: (415) 439-1500
Email: michael.esser@kirkland.com

Attorneys for Defendant
PRICEWATERHOUSECOOPERS LLP

Daniel Kohrman (admitted *pro hac vice*)
Laurie McCann (admitted *pro hac vice*)
Dara Smith (admitted *pro hac vice*)
AARP FOUNDATION LITIGATION
601 E. Street, N.W.
Washington, D.C. 20049
Telephone: (202) 434-2060
Facsimile: (202) 434-2082
E-mail: dkohrman@aarp.org
E-mail: lmccann@aarp.org
E-mail: dsmith@aarp.org

Jennifer L. Liu (Cal. Bar No. 279370)
THE LIU LAW FIRM, P.C.
1390 Market Street, Suite 200
San Francisco, CA 94102
Telephone: (415) 896-4260
Facsimile: (415) 231-0011
E-mail: jliu@liulawpc.com

*Attorneys for Plaintiff and Proposed Class
and Collective Members*

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

Pursuant to the Stipulation, it is so ORDERED.

Dated: March 29, 2017

By: 
The Honorable Jon S. Tigar
UNITED STATES DISTRICT JUDGE

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

ATTESTATION PURSUANT TO CIVIL L.R. 5-1(i)(3)

I, Mark Premo-Hopkins, am the ECF User whose ID and password are being used to file this document. I hereby attest that concurrence in the filing of this document has been obtained from the signatories.

Dated: March 28, 2017

By: /s/ Mark Premo-Hopkins
Mark Premo-Hopkins