

Trucker ♦ Huss  
A Professional Corporation  
One Embarcadero Center, 12<sup>th</sup> Floor  
San Francisco, California 94111

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**Todd M. Schneider** (SBN 158253)  
**Jason H. Kim** (SBN 220279)  
**Kyle G. Bates** (SBN 299114)  
SCHNEIDER WALLACE  
COTTRELL KONECKY  
WOTKYNS LLP  
2000 Powell Street, Suite 1400  
Emeryville, California 94608  
Tel: (415) 421-7100  
Fax: (415) 421-7105  
tschneider@schneiderwallace.com  
jkim@schneiderwallace.com  
kbates@schneiderwallace.com  
*Attorneys for Plaintiff*

TRUCKER ♦ HUSS  
R. Bradford Huss  
Angel L. Garrett  
Dylan D. Rudolph  
One Embarcadero Center, 12th Floor  
San Francisco, CA 94111  
Tel: (415) 788-3111  
Fax: (415) 421-2017  
Email: bhuss@truckerhuss.com  
agarrett@truckerhuss.com  
drudolph@truckerhuss.com

Joseph C. Faucher, No. 137353  
633 W. 5th Street, 28th Floor  
Los Angeles, California 90071  
Telephone: (213) 537-1016  
Facsimile: (213) 537-1020  
E-mail:jfaucher@truckerhuss.com

**Attorneys for Defendants**  
SAFEWAY INC. and SAFEWAY  
BENEFIT PLANS COMMITTEE

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

DENNIS M. LORENZ, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SAFEWAY, INC.; SAFEWAY BENEFIT  
PLANS COMMITTEE; GREAT-WEST  
FINANCIAL RPS LLC; and DOES 1 through  
50, inclusive,

Defendants.

Case No. 3:16-cv-04903-JST

**JOINT STIPULATION TO CONTINUE  
CASE DEADLINES AND ~~PROPOSED~~  
ORDER**

Assigned to Hon. Jon S. Tigar

1 Plaintiff, Dennis M. Lorenz (“Plaintiff”), and Defendants, Safeway Inc. (“Safeway”) and  
2 Safeway Benefit Plans Committee (“Benefit Plans Committee”), collectively (“Defendants”),  
3 through their counsel, hereby stipulate and agree that:

4 WHEREAS, Plaintiff filed a complaint against Defendants and Great-West Financial RPS  
5 LLC (“Great-West”) on August 25, 2016;

6 WHEREAS, Plaintiff filed an Amended Complaint on September 16, 2016 (Docket No. 7);

7 WHEREAS, Plaintiff filed a Second Amended Complaint on November 21, 2016 (Docket  
8 No. 31);

9 WHEREAS, the Court dismissed the claims against Great-West with prejudice and  
10 consequently removed Great-West as a defendant in this action on March 13, 2017 (Docket No. 58);

11 WHEREAS, Plaintiff filed a Third Amended Complaint on March 31, 2017 (Docket No.  
12 66);

13 WHEREAS, after the Court found this matter to be related to the case of *Maria Karla*  
14 *Terraza v. Safeway Inc., et al.* (No. 16-cv-03994-JST) (see Docket No. 26), the Parties in this matter  
15 and *Terraza* streamlined their discovery process;

16 WHEREAS, the Parties have exchanged initial disclosures, engaged in written discovery,  
17 and are in the process of scheduling depositions;

18 WHEREAS, based on the initial disclosures and the deposition notice the plaintiff in  
19 *Terraza* served on Defendants, it is estimated that numerous depositions may be scheduled for  
20 mutually agreeable dates and times;

21 WHEREAS, although the Parties have been working diligently and cooperatively in the  
22 discovery process and in preparing this case for trial, the Parties believe that, given the number of  
23 depositions and the scope of discovery, the current schedule does not provide adequate time to  
24 complete discovery and submit dispositive motions. The Parties therefore respectfully request that  
25 the Court continue the case deadlines as detailed below;

26 WHEREAS, the Parties have previously made one request to extend the deadlines for  
27 completing discovery and filing dispositive motions, and the pretrial and trial dates (Dkt. 78);

28 WHEREAS, the Parties do not propose any change in the trial schedule or the remainder of

1 the pretrial schedule;

2 NOW, THEREFORE, the Parties, through their respective counsel, hereby stipulate, subject  
3 to the approval of the Court, to the following schedule:

4 April 27, 2018 – Deadline to complete fact discovery

5 May 11, 2018 – Deadline for expert disclosures

6 May 30, 2018 – Deadline for expert rebuttal

7 June 8, 2018 – Deadline to complete expert discovery

8 June 21, 2018 – Deadline to file dispositive motions

9 IT IS SO STIPULATED.

10 DATED: February 16, 2018

TRUCKER ♦ HUSS

11 By: /s/R. Bradford Huss  
12 R. Bradford Huss  
13 Attorneys for Defendants  
14 SAFEWAY INC. and SAFEWAY BENEFIT  
15 PLANS COMMITTEE

16 Dated: February 16, 2018

SCHNEIDER, WALLACE, COTTRELL, KONECKY,  
WOTKYNs, LLP

17 By: /s/Kyle G. Bates  
18 Kyle G. Bates  
19 Attorneys for Plaintiff  
20 DENNIS M. LORENZ

21 I attest that my firm has obtained concurrence in the filing of this document from Kyle G. Bates.

22 DATED: February 16, 2018

TRUCKER ♦ HUSS

23 By: /s/R. Bradford Huss  
24 R. Bradford Huss  
25 Attorneys for Defendants  
26 SAFEWAY INC. and BENEFIT PLANS  
27 COMMITTEE SAFEWAY INC.  
28

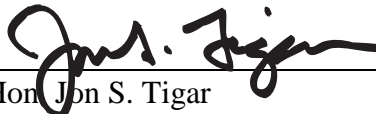
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~~PROPOSED~~ ORDER

Good cause exists for an order continuing the deadlines for completing fact and expert discovery, including submitting expert disclosures and rebuttals, and filing dispositive motions to the following dates:

- April 27, 2018 – Deadline to complete fact discovery
- May 11, 2018 – Deadline for expert disclosures
- May 30, 2018 – Deadline for expert rebuttal
- June 8, 2018 – Deadline to complete expert discovery
- June 21, 2018 – Deadline to file dispositive motions

DATED: February 21, 2018

  
\_\_\_\_\_  
Hon. John S. Tigar  
United States District