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12 Attorneys for Defendants
 13 GALDERMA LABORATORIES, L.P.

14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**

16 ANDREA GREENBERG, on behalf of herself
 17 and all others similarly situated,

18 Plaintiff,

19 vs.

20 GALDERMA LABORATORIES, L.P., and
 21 DOES 1-100,

22 Defendants.

Case No. 3:16-CV-06090-WHO

**STIPULATED REQUEST AND ORDER
 FOR AN ORDER EXTENDING TIME**

Action Removed: October 21, 2016

1 Plaintiff Andrea Greenberg (“Plaintiff”) and defendant Galderma Laboratories, L.P.
2 (“Galderma”) (collectively, the “Parties”), by and through their respective counsel of record and
3 pursuant to Local Rule 6-1(b), submit the following stipulated request for an extension of time
4 and for re-setting the briefing and hearing schedules for Plaintiff’s Motion to Remand and
5 Defendant’s Motion to Dismiss:

6 WHEREAS, Plaintiff’s complaint (Dkt. 1-2) was originally filed in the Superior Court of
7 the State of California, County of Alameda, Case No. RG16831799.

8 WHEREAS, on October 21, 2016, Galderma filed a Notice of Removal removing this
9 action to the Northern District of California, Case No. 3:16-CV-06090.

10 WHEREAS, on October 25, 2016, the Parties stipulated to extend Galderma’s deadline to
11 file its motion to dismiss the complaint from October 28, 2016 to November 28, 2016.

12 WHEREAS, on November 28, 2016, Galderma moved to dismiss the complaint.

13 WHEREAS, on December 6, 2016, the Parties stipulated to a briefing and hearing
14 schedule, setting the deadlines for briefing and hearings on the Motion to Remand and the
15 remainder of the briefing due on the Motion to Dismiss and continuing the initial Case
16 Management Conference from January 24, 2017 until after the Court’s ruling on the Motion to
17 Remand and the Motion to Dismiss.

18 WHEREAS, on December 7, 2016, the Court approved the stipulated briefing and
19 hearing schedule and ordered the deadlines and dates as follows:

- 20 a) Plaintiff’s deadline to file a Motion to Remand the case to the Superior
21 Court was set for on or before December 19, 2016;
22 b) Galderma’s deadline to file its opposition papers to Plaintiff’s Motion to
23 Remand was set for on or before January 18, 2017;
24 c) Plaintiff’s deadline to file her reply papers related to any Motion to
25 Remand was set for on or before March 24, 2017;
26 d) Plaintiff’s deadline to file her opposition papers to the Motion to Dismiss
27 was set for on or before February 24, 2017;
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- e) Galderma’s deadline to file its reply papers in support of its Motion to Dismiss was set for on or before March 24, 2017;
- f) The hearing for the Motion to Dismiss and the Motion to Remand was set for April 5, 2017, at 2:00 p.m.; and
- g) The Case Management Conference was postponed until April 25, 2017.

WHEREAS, on December 19, 2016, Plaintiff filed a Motion to Remand.

WHEREAS, on January 18, 2017, Galderma filed its Opposition to Plaintiff’s Motion to Remand.

WHEREAS, on January 25, 2017, Plaintiff served on Galderma: (1) Plaintiffs’ First Set of Requests for Production of Documents to Defendant Galderma Laboratories, L.P.; and (2) Notice of Deposition Pursuant to Federal Rule of Civil Procedure 30(b)(6) related to Plaintiff’s Motion to Remand. The deadline for Galderma to respond to Plaintiff’s First Set of Requests for Production of Documents is February 27, 2017 and the deposition is currently set for March 8, 2017.

WHEREAS, the Parties are currently engaged in discussions to resolve this case, which would obviate the need for continued discovery and briefing in this matter. Accordingly, the Parties agree that it would be most efficient to continue current deadlines in the case for approximately thirty (30) days.

WHEREAS, the Parties agree that neither will be prejudiced by the agreed-upon extension, nor will this litigation be unreasonably delayed.

NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE to the following schedule:

- a) Plaintiff’s deadline to file her reply papers related to any Motion to Remand shall be set for on or before April 24, 2017;
- b) Plaintiff’s deadline to file her opposition papers to the Motion to Dismiss shall be set for on or before March 27, 2017;
- c) Galderma’s deadline to respond to Plaintiff’s First Set of Requests for

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Production of Documents shall be set for on or before March 29, 2017;

- d) The Parties will meet and confer on a date for the deposition requested in Plaintiff’s Notice of Deposition Pursuant to Federal Rule of Civil Procedure 30(b)(6), which will be set for a mutually convenient date on or after April 7, 2017 but no later than April 14, 2017;
- e) Galderma’s deadline to file its reply papers in support of its Motion to Dismiss shall be set for on or before April 24, 2017;
- f) The hearing for the Motion to Dismiss and the Motion to Remand shall be postponed until May 10, 2017, at 2:00 p.m., or at such other time thereafter as the Court might schedule; and
- g) The Case Management Conference presently scheduled for April 25, 2017 shall be postponed until May 30, 2017, or at such other time thereafter as the Court might schedule.

DATED: February 14, 2017

MAYER BROWN LLP
Dale J. Giali
Keri E. Borders
Rebecca B. Johns

By: /s/Dale J. Giali
Dale J. Giali
Attorneys for Defendant

DATED: February 14, 2017

LEXINGTON LAW GROUP
Howard Hirsch
Abigail Blodgett

By: /s/Howard Hirsch
Howard Hirsch
Attorneys for Plaintiff

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ATTESTATION

I, Dale J. Giali, hereby attest, pursuant to N.D. Cal. Local. Rule 5.1(i)(3), that concurrence to the filing of this document has been obtained from each signatory.

By: /s/ Dale J. Giali

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ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: February 17, 2017


UNITED STATES DISTRICT COURT JUDGE