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13 Attorneys for Defendants Target Corporation,  
 14 International Vitamin Corporation, and  
 15 Perrigo Company of South Carolina, Inc.

16 **UNITED STATES DISTRICT COURT**  
 17 **NORTHERN DISTRICT OF CALIFORNIA**

18 TODD GREENBERG, On Behalf of  
 19 Himself and All Others Similarly Situated,

20 Plaintiff,

21 vs.

22 TARGET CORPORATION, a Minnesota  
 23 Corporation, INTERNATIONAL  
 24 VITAMIN CORPORATION, a New Jersey  
 25 Corporation, and PERRIGO COMPANY  
 26 OF SOUTH CAROLINA, INC.,

27 Defendants.

Case No. 3:17-cv-01862-RS

CLASS ACTION

**JOINT STIPULATION AND**  
~~**[PROPOSED]**~~ **ORDER REGARDING**  
**CLASS CERTIFICATION**  
**SCHEDULE**

Complaint Filed: April 4, 2017  
 Trial Date: None Set



1 Plaintiff Todd Greenberg (“Plaintiff”) and Defendants Target Corporation  
2 (“Target”), International Vitamin Corporation (“IVC”), and Perrigo Company of South  
3 Carolina, Inc. (“Perrigo”) (collectively, “Defendants”), by and through their respective  
4 counsel submit the following stipulation:

5 WHEREAS Plaintiff’s Second Amended Complaint was deemed filed by Court  
6 Order dated April 13, 2018;

7 WHEREAS Target and IVC substituted new counsel on May 4, 2018, which  
8 counsel now also represents Perrigo;

9 WHEREAS this Court previously entered an extension of time for Defendants to  
10 respond to the Second Amended Complaint, as well as to briefly extend the class  
11 certification dates;

12 WHEREAS, based on information provided by Defendants, Plaintiff filed his  
13 Corrected Second Amended Complaint on June 22, 2018 for purposes of naming the  
14 correct defendant. Defendants filed their respective Answers to Plaintiff’s Corrected  
15 Second Amended Complaint on July 5, 2018;

16 WHEREAS due to the extent and scope of written discovery required from the  
17 newly added Defendants (IVC/Perrigo), as well as deposition discovery required from all  
18 the parties, required to prosecute and defend class certification, as well as scheduling  
19 complications associated with such discovery, the Parties hereby jointly stipulate to  
20 modify the class certification schedule as follows:

- 21 a. The last day for Plaintiff to file a Motion for Class Certification is extended  
22 from September 6, 2018 to December 6, 2018;
- 23 b. The last day for Defendants to file an Opposition to Class Certification is  
24 extended from November 15, 2018 to February 14, 2018;
- 25 c. The last day for Plaintiff to file a Reply in Support of Class Certification is  
26 extended from January 10, 2019 to April 11, 2019; and
- 27 d. The hearing on Plaintiff’s Motion is continued from January 24, 2019 to  
28 May 9, 2019, or another date convenient for this Court.

1 IT IS SO STIPULATED.

2  
3 Dated: August 8, 2018

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A Professional Corporation

4  
5  
6 By: /s/ Matthew R. Orr<sup>1</sup>  
Matthew R. Orr

7 Attorneys for Defendants Target Corporation,  
8 International Vitamin Corporation, and  
9 Perrigo Company of South Carolina, Inc.

10 Dated: August 8, 2018

BONNETT, FAIRBOURN, FRIEDMAN  
& BALINT, PC

11  
12  
13 By: /s/ Patricia N. Syverson  
Patricia N. Syverson

14 Attorneys for Plaintiff Todd Greenberg

15  
16  
17 ~~PROPOSED~~ ORDER

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19  
20  
21 Date: 8/8/18



22 HON. RICHARD SEEBORG  
23 UNITED STATES DISTRICT JUDGE

24  
25  
26 CALL &  
JENSEN  
EST. 1981

27  
28 <sup>1</sup>, Matthew R. Orr, hereby attest, pursuant to Northern District of California Civ. L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.