

1 EMILY JOHNSON HENN (Bar No. 269482)
 2 KATHRYN E. CAHOY (Bar No. 298777)
 3 COVINGTON & BURLING LLP
 333 Twin Dolphin Drive, Suite 700
 Redwood Shores, California 94065-1418
 Telephone: + 1 (650) 632-4700
 Facsimile: + 1 (650) 632-4800
 Email: ehenn@cov.com
 Email: kcahoey@cov.com

PATRICIA N. SYVERSON (SBN 203111)
 MANFRED P. MUECKE (SBN 222893)
 BONNETT, FAIRBOURN, FRIEDMAN &
 BALINT, P.C.
 600 W. Broadway, Suite 900
 San Diego, CA 92101
 Telephone: (619) 798-4593
 psyverson@bffb.com
 mmuecke@bffb.com

7 *Attorneys for Defendants Philosophy, Inc.,*
 8 *Philosophy Mezzanine Corp., and Coty, Inc.*

Attorneys for Plaintiff Vivian Bogdanic

10 UNITED STATES DISTRICT COURT
 11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 12 OAKLAND DIVISION

14 VIVIAN BOGDANIC, on behalf of herself and all
 others similarly situated,

15 Plaintiff,

17 v.

18 PHILOSOPHY, INC., an Arizona company,
 19 PHILOSOPHY MEZZANINE CORP., a Delaware
 corporation, and COTY, INC., a Delaware
 company,

21 Defendants.

Civil Case No.: 3:17-cv-05094-JST

**JOINT STIPULATION AND ~~PROPOSED~~
 ORDER MODIFYING CASE
 MANAGEMENT SCHEDULE**

1 The undersigned counsel for Plaintiff Vivian Bogdanic, (“Plaintiff”) and Defendants
2 Philosophy, Inc., Philosophy Mezzanine Corp., and Coty, Inc. (“Defendants”) in the above-captioned
3 action hereby stipulate and agree as follows:

4 1. Pursuant to ECF No. 16, the Court set an initial case management conference for
5 December 6, 2017, at 2:00 PM. The Court also required the parties to file a joint case management
6 conference statement by November 29, 2017, at 5:00 PM.

7 2. Plaintiff and Defendants have been working in good faith to resolve or narrow the issues
8 that would need to proceed before the Court in this case.

9 3. Re-scheduling the initial case management conference and corresponding joint case
10 management conference statement due date and discovery deadlines would facilitate those discussions
11 and reduce the burden on the Court and the parties.

12 4. Accordingly, Plaintiff and Defendants respectfully request that the Court re-schedule the
13 initial case management conference for a date on or after January 17, 2018, and re-schedule the due date
14 for the corresponding joint case management conference statement to one week before the date on which
15 the initial case management conference would be held.

16 5. The parties agree that any other dates triggered by the initial case management
17 conference, including the date by which the parties should meet and confer pursuant to Federal Rule of
18 Civil Procedure 26(f) or exchange initial disclosures pursuant to Federal Rules of Civil Procedure 26(a),
19 would be moved in accordance with the new date for the initial case management conference.

20 IT IS SO STIPULATED.

21
22 DATED: November 16, 2017

Respectfully submitted,

23 By: /s/ Kathryn E. Cahoy
24 Emily Johnson Henn (SBN 269482)
25 Kathryn E. Cahoy (SBN 298777)
26 COVINGTON & BURLING LLP
27 333 Twin Dolphin Drive, Suite 700
28 Redwood Shores, CA 94065-1418
Phone: 650-632-4700
Fax: 650-632-4800
Email: ehenn@cov.com
Email: kcahoy@cov.com

Attorneys for Defendants
Philosophy, Inc., Philosophy
Mezzanine Corp., and Coty, Inc.

By: /s/ Patricia N. Syverson
Patricia N. Syverson (SBN 203111)
Manfred P. Muecke (SBN 222893)
BONNETT, FAIRBOURN,
FRIEDMAN & BALINT, P.C.
600 W. Broadway, Suite 900
San Diego, CA 92101
Telephone: (619) 798-4593
psyverson@bffb.com
mmuecke@bffb.com

Attorneys for Plaintiff Vivian
Bogdanic

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: November 17, 2017



Hon. Jon S. Tigar
United States District Judge