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12	· '				
13	Counsel for Plaintiffs and the National and California Classes				
14	UNITED STATES DISTRICT COURT				
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16					
17	GOPI VEDACHALAM and KANGANA	CASE NO. C 06-0963 (CW)			
18	BERI, on behalf of themselves and all others similarly situated,	JOINT STIPULATION AND ORDER TO STAY COURT DEADLINES			
19 20	Plaintiffs,				
20	V.				
22	TATA CONSULTANCY SERVICES, LTD, an Indian Corporation; and TATA				
23	SONS, LTD, an Indian Corporation,				
24	Defendants.				
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1	STIPULATION		
2	Plaintiffs Gopi Vedachalam	Plaintiffs Gopi Vedachalam and Kangana Beri ("Plaintiffs"), on behalf of themselves and	
3	the PlaintiffNational and California Classes, and Defendants Tata Consultancy Services, Ltd. and		
4	Tata Sons, Ltd. (together, "Defendants") hereby stipulate and agree as follows:		
5	WHEREAS, the parties conducted a private mediation before Susan Haldeman on		
6	October 16 and 17, 2012, as well as additional telephonic conferences with Ms. Haldeman;		
7	WHEREAS, the parties are continuing their mediation discussions in an effort to resolve		
8	this matter;		
9	WHEREAS, to facilitate those discussions, the parties respectfully request that this Court		
10	stay all Court deadlines for 90 days, though the parties intend to use their best efforts to complete		
11	their negotiation within the next 45 days and inform the Court of their progress at that time;		
12	IT IS HEREBY STIPULATED AND AGREED that this litigation be stayed until		
13	February 4, 2013.		
14	Respectfully submitted,		
15	Dated: November 5, 2012	RUKIN HYLAND DORIA & TINDALL LLP	
16		By: <u>Is/ Steven M Tindall</u> Steven M. Tindall	
17		Rosha Jones (State Bar No.279143) rjones@rhdtlaw.com	
18		100 Pine Street, Suite 2150 San Francisco, CA 94111	
		Telephone: (415) 421-1800	
19		Facsimile: (415) 421-1700	
20	Dated: November 5, 2012	LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP	
21		By: <u>Is/KellyM Dermody</u>	
22		Kelly M. Dermody (State Bar No. 171716) kdermody@lchb.com	
23		Daniel M. Hutchinson (State Bar No. 239458) dhutchinson@lchb.com	
24		Anne Shaver (State Bar No. 255928) ashaver@lchb.com	
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JOINT STIPULATION AND [PROPOSED] ORDER TO STAY COURT DEADLINES CASE NO. C 06-0963 (CW)

1		Counsel for Plaintiffs and the National and California Classes
2	Dated: November 5, 2012	LOEB & LOEB, LLP
		By: <u>Is/Michelle La Mar</u>
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9	Dated: November 5, 2012	KELLEY DRYE & WARREN, LLP
10	Dated. 140vember 3, 2012	By: Is/Robert 1 Steiner
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16		Telephone: (212) 808-7800 Facsimile: (212) 808-7897
17		Attorneys for Defendants TATA CONSULTANCY SERVICES, LTD., and TATA SONS, LTD.
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1 I	In light of the parties' stipulation regarding their ongoing attempts to resolve this matter
2	the Court concludes that, in the interests of judicial efficiency, all litigation and all deadlines in
3	the matter should be stayed, and are hereby stayed, for 90 days.
4	The parties are to provide the Court with an update of their status by February 4, 2013.
5	
6	IT IS SO ORDERED. All existing deadlines are extended by 90 days, except the pretrial and
7	trial dates.
8	Dated: November 8, 2012  By: HON. CLAUDIA WILKEN
9	United States District Court Judge
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