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9 *Attorneys for Plaintiffs and the Class*

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

14 DOE 1, DOE 2, and KASADORE
 RAMKISSOON, on Behalf of
 15 Themselves and all other Persons
 Similarly Situated,

16 Plaintiffs,

17 v.

18 AOL LLC,

19 Defendant.
 20

) CASE NO. C 06-5866 SBA

) Honorable Sandra Brown Armstrong

) **JOINT STIPULATION and ORDER FOR
 A LIMITED EXTENSION OF
 DISCOVERY DEADLINE**

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 27 [C 06-5866 SBA]
 28 **JOINT STIPULATION and
 [PROPOSED] ORDER FOR
 A LIMITED EXTENSION
 OF DISCOVERY DEADLINE**

RECITALS

1 WHEREAS the Court has ordered that all discovery, except for expert discovery, shall
2
3 be completed and all depositions taken before November 5, 2010.

4 WHEREAS the parties have been working diligently to meet the November 5, 2010
5 discovery deadline.

6 WHEREAS because of scheduling conflicts beyond the parties' control, the deposition
7 of one non-party witness (John Kannapell) could not be scheduled until November 10, 2010.

8 WHEREAS in the course of discovery, numerous discovery disputes have arisen that
9
10 the parties were able to resolve through the meet-and-confer process.

11 WHEREAS there are several outstanding discovery disputes that the parties have not
12 been able to resolve through the meet and confer process.

13 WHEREAS Plaintiffs have indicated their intent to seek the intervention of Magistrate
14 Judge Spero with respect to those remaining discovery disputes, in accordance with Magistrate
15 Judge Spero's Standing Order on Discovery Disputes.

16 WHEREAS should Magistrate Judge Spero order AOL to produce additional
17 documents it may take additional time for AOL to comply with such an order.

18 WHEREAS the parties have not previously requested any extension of time with
19
20 respect to the discovery deadline.

21 WHEREAS the requested time modification would not have any other effect on the
22 schedule for the case.

23 IT IS THEREFORE STIPULATED by and between the parties, acting through their
24 counsel of record, that, subject to the Court's approval, the discovery deadline be extended by
25
26 thirty-one (31) days, until December 6, 2010, for the limited purpose of allowing Plaintiffs to

27 [C 06-5866 SBA]
28 **JOINT STIPULATION and
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1 take the deposition of John Kannapell and allowing AOL to comply with any order entered by
2 Magistrate Judge Spero with respect to any outstanding discovery disputes.

3 SO STIPULATED

4 Dated: November 8, 2010

5
6 /s/ Manuel J. Dominguez

7
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[C 06-5866 SBA]

**JOINT STIPULATION and
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E-Filing Attestation

I, Nathaniel L. Orenstein, am the ECF User whose ID and password are being used to file this document. In compliance with General Order 45 X.B, I hereby attest that the signatory identified below concurred in its filing.

/s/Nathaniel L. Orenstein
Nathaniel L. Orenstein
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Attorneys for AOL LLC

ORDER

IT IS SO ORDERED.

Dated: 11/5/10


THE HONORABLE SAUNDRA B. ARMSTRONG
UNITED STATES DISTRICT JUDGE

[C 06-5866 SBA]
**JOINT STIPULATION and
[PROPOSED] ORDER FOR
A LIMITED EXTENSION
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