

1 STEVEN M. SELNA (SBN #133409)  
 steven.selna@dbr.com  
 2 JOHN J. POWERS (SBN #145623)  
 john.powers@dbr.com  
 3 BETH O. ARNESE (SBN #241186)  
 beth.arnese@dbr.com  
 4 DRINKER BIDDLE & REATH LLP  
 50 Fremont Street, 20th Floor  
 5 San Francisco, CA 94105-2235  
 Telephone: (415) 591-7500  
 6 Facsimile: (415) 591-7510

7 Attorneys for Defendant  
 8 JOHNSON & JOHNSON CONSUMER  
 COMPANIES, INC.

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

14 THERESA HERRINGTON, ANNA  
 15 HALEY, JOY SARJENT, KIMBERLY  
 FOURNIER, CINDY KING, and CLAIRE  
 16 THEODORE, individually and on behalf of  
 herself and all others similarly situated,

17 Plaintiffs,

18 v.

19 JOHNSON & JOHNSON CONSUMER  
 20 COMPANIES, INC., L'OREAL USA,  
 INC., KIMBERLY-CLARK  
 21 CORPORATION, CVS/CAREMARK  
 CORPORATION, and TARGET  
 22 CORPORATION,

23 Defendants.

Case No. CV 09 1597 CW (EMC)

**STIPULATION TO CONTINUE AND  
 RESET PLAINTIFFS' MOTION TO  
 COMPEL FURTHER RESPONSES TO  
 PLAINTIFFS' FIRST SET OF REQUESTS  
 FOR PRODUCTION;  
 [PROPOSED] ORDER**

25 Plaintiffs THERESA HERRINGTON, ANNA HALEY, JOY SARGENT, KIMBERLEY  
 26 FOURNIER, and CINDY KING ("Plaintiffs") AND Defendant JOHNSON & JOHNSON  
 27 CONSUMER COMPANIES, INC. ("JJCCI"), by and through their respective attorneys of record,  
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1 in the interests of judicial economy, hereby stipulate and agree to the following:

2 WHEREAS, Plaintiffs filed a Motion to Compel Further Responses from Defendant  
3 JJCCI To Plaintiffs' First Set Of Requests For Production on June 1, 2010 (Docket # 167);

4 WHEREAS, Plaintiffs' Motion to Compel Further Responses to Plaintiffs' First Set of  
5 Requests for Production ("Plaintiffs' Motion to Compel") and all further discovery motions filed  
6 in the above-captioned case were referred to Magistrate Judge Edward M. Chen on June 3, 2010  
7 (Docket # 170);

8 WHEREAS, via Clerk's Notice entered June 4, 2010, Plaintiffs' Motion to Compel was  
9 set for July 14, 2010 at 10:30 a.m. before Magistrate Judge Edward M. Chen, with the opposition  
10 due to be filed by June 23, 2010 and the reply to be filed by June 30, 2010 (Docket # 172);

11 WHEREAS, Defendants, including JJCCI, filed an Omnibus Motion to Stay Discovery  
12 Pending Outcome of Filed Motions to Dismiss on June 16, 2010 (Docket # 173);

13 WHEREAS, Plaintiffs filed a Motion For Entry Of Discovery Protocol on June 17, 2010  
14 (Docket # 177);

15 WHEREAS, via Clerk's Notice entered June 30, 2010 (Docket # 182), Defendants  
16 Omnibus Motion to Stay Discovery Pending Outcome of Filed Motions to Dismiss and Plaintiffs'  
17 Motion For Entry Of Discovery Protocol were both reset to July 28, 2010 at 10:30 a.m. before  
18 Magistrate Judge Edward M. Chen in Courtroom C, 15th Floor, 450 Golden Gate Avenue, San  
19 Francisco, California 94102 (Docket Entry #182);

20 WHEREAS, in the interest of judicial economy, Plaintiffs and Defendant JJCCI hereby  
21 stipulate and agree that, subject to Court approval, Plaintiffs' Motion to Compel also be  
22 continued and reset to July 28, 2010, at 10:30 a.m. before Magistrate Judge Edward M. Chen.

23 THEREFORE, the parties hereby stipulate and agree, subject to Court approval, that  
24 Plaintiffs' Motion to Compel currently scheduled for July 14, 2010 at 10:30 a.m. before  
25 Magistrate Judge Edward M. Chen, shall be continued and reset to July 28, 2010, at 10:30 a.m.  
26 before Magistrate Judge Edward M. Chen.

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1           \*I, Beth O. Arnese, am the ECF user whose ID and password are being used to file this  
2 Stipulation to Continue the Hearing on Plaintiff's Motion to Compel. In compliance with General  
3 Order 45.X.B., I hereby attest that the counsel listed above concurred with this filing.  
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5 PURSUANT TO STIPULATION, IT IS SO ORDERED.

6 DATED: \_\_\_\_\_, 2010 \_\_\_\_\_  
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8 Hon. Edward M. Chen  
9 United States District Court Magistrate Judge  
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