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17 Attorneys for Plaintiff  
 18 LEAH BULLEN

19 UNITED STATES DISTRICT COURT  
 20 NORTHERN DISTRICT OF CALIFORNIA  
 21 OAKLAND DIVISION

21 LEAH BULLEN, individually, and on  
 22 behalf of other members of the general  
 public similarly situated,  
 23 Plaintiff,  
 vs.  
 24 CITIGROUP GLOBAL MARKETS, INC.,  
 25 d/b/a SMITH BARNEY,  
 26 Defendant.

Case No. 4:09-CV-04117 SBA (EDL)  
**JOINT STIPULATION AND ORDER TO  
 EXTEND CERTAIN DEADLINES**

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Plaintiff Leah Bullen (“Plaintiff”) and Defendant Citigroup Global Markets Inc. (“CGMI”), by and through their attorneys of record, hereby stipulate to modify certain deadlines set forth in this Court’s Order for Pretrial Preparation (“Order”).

WHEREAS, Plaintiff served a Federal Rule of Civil Procedure 30(b)(6) deposition notice on June 3, 2011 for a deposition to occur June 22, 2011;

WHEREAS, on June 21, 2011, CGMI filed a Motion for Protective Order in response to Plaintiff’s Federal Rule 30(b)(6) deposition notice;

WHEREAS, per the Order for Pretrial Preparation in this action, the discovery cut-off was July 1, 2011;

WHEREAS, this Court held a hearing on CGMI’s Motion on August 2, 2011;

WHEREAS, at the hearing, Plaintiff’s counsel informed the Court that Plaintiff has decided that she will no longer pursue class certification and is withdrawing the class allegations in her Complaint;

WHEREAS, the Court granted CGMI’s Motion in part, without prejudice to Plaintiff re-noticing a deposition tailored to her individual claim only, regardless of the July 1, 2011 discovery cut-off;

WHEREAS, per the Order for Pretrial Preparation, CGMI must file any dispositive motion by August 16, 2011;

WHEREAS, Plaintiff and CGMI need additional time to schedule and complete the deposition tailored to Plaintiff’s individual claim and likely cannot do so and receive the transcript prior to August 16, 2011;

For the foregoing reasons, Plaintiff and CGMI hereby stipulate and respectfully request that the following modifications be made to the Court’s Order for Pretrial Preparation:

	<b>Previous Date</b>	<b>New Date</b>
Dispositive Motion Hearing Deadline	9/20/11	11/22/11
Mandatory Settlement Conference	9/21-10/7/11	11/23-12/9/11
Pretrial Preparation	10/11/11	12/13/11

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Motions in Limine/Objections to Evidence 10/18-11/1/11 12/27-1/10/12  
Pretrial Conference 11/8/11 1/17/12  
Trial 11/28/11 2/6/12

Dated: August 4, 2011 MORGAN, LEWIS & BOCKIUS LLP

By /s/ Daryl S. Landy  
Daryl S. Landy  
Shweta Gera  
Attorneys for Defendant  
CITIGROUP GLOBAL MARKETS INC.

Dated: August 4, 2011 INITIATIVE LEGAL GROUP, APC

By /s/ Gene Williams  
David M. Medby  
Gene Williams  
Sang Park  
Mark Estrella  
Attorneys for Plaintiff  
LEAH BULLEN

**ORDER**

**IT IS SO ORDERED WITH THE FOLLOWING MODIFICATION:** The dispositive motion hearing deadline is by November 15, 2011. Motions in limine/objections to evidence shall be filed by no later than December 20, 2011; oppositions to motions in limine/objections to evidence shall be filed by no later than December 27, 2011; and replies to motions in limine/objections to evidence shall be filed by no later than January 3, 2012. The parties shall follow this Court's Standing Order pertaining to page limits.

IT IS SO ORDERED.

Dated: August 16, 2011

  
HON. SAUNDRA B. ARMSTRONG  
UNITED STATES DISTRICT COURT JUDGE