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15 Attorneys for Plaintiff
 LYNN ODRICK

17 UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 18 OAKLAND DIVISION

19 LYNN ODRICK, an individual, on behalf of)	Case No. 10-CV-5565-SBA
20 all others similarly situated and the general)	
21 public,)	STIPULATION TO AMEND BRIEFING
22)	AND HEARING DATES FOR
23 Plaintiff,)	PLAINTIFF'S MOTION FOR CLASS
24 v.)	CERTIFICATION AND ORDER
25)	
26 UNIONBANCAL CORPORATION, a)	
27 Corporation, UNION BANK, N.A., a)	
28 corporation, and DOES 1-10,)	
)	
Defendants.)	

1 Plaintiff LYNN ODRICK (“Plaintiff”) and Defendants UNION BANK, N.A. and
2 UNIONBANCAL CORPORATION (“Defendants”) (collectively, “the Parties”), by and through
3 their respective counsel, hereby stipulate as follows respecting an amended briefing schedule and
4 hearing date for Plaintiff’s Motion for Class Certification pursuant to Rule 23 of the Federal
5 Rules of Civil Procedure 23 and 29 U.S.C. § 216(b) (“Motion”):

6 WHEREAS, the Parties participated in a private mediation on September 26, 2011, and,
7 the Parties are currently considering a mediator’s proposal;

8 WHEREAS, Plaintiff now seeks to amend her complaint to add new named plaintiffs;

9 WHEREAS, Defendants will need to conduct individual discovery on the new plaintiffs
10 before filing their opposition to Plaintiff’s Motion;

11 WHEREAS, Plaintiff also needs to conduct several Rule 30(b)(6) depositions in advance
12 of filing her Motion;

13 WHEREAS, defense counsel had an arbitration scheduled this month that hindered
14 scheduling Rule 30(b)(6) depositions in October;

15 WHEREAS, due to complexity of the issues in this hybrid Rule 23/§ 216(b) action,
16 Defendants require more time than the two-week turnaround currently provided to prepare an
17 opposition to Plaintiff’s Motion;

18 WHEREAS, Plaintiff’s Motion is currently due November 1, 2011, Dkt. No. 22;

19 WHEREAS, Defendants’ opposition to Plaintiff’s Motion is currently due November 15,
20 2011;

21 WHEREAS, Plaintiff’s reply brief in support of her Motion is currently due November
22 22, 2011, Dkt. No. 22;

23 WHEREAS, Plaintiff’s Motion is currently set for hearing before this Court on December
24 13, 2011 at 1:00 p.m., Dkt. No. 22;

25 WHEREAS, counsel for the parties have planned vacations in December 2011; and

26 WHEREAS, defense counsel has a two-week trial scheduled in mid-February 2012.

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1 NOW THEREFORE, it is hereby stipulated and agreed by the Parties as follows:

- 2 1. The Parties shall file a stipulation to amend the complaint to add the new
3 plaintiffs by November 11, 2011;
- 4 2. Plaintiff's Motion will be due on March 1, 2012;
- 5 3. Defendants' opposition to Plaintiff's Motion will be due on March 29, 2012;
- 6 4. Plaintiff's reply brief in support of her Motion will be due on April 12, 2012; and
- 7 5. All other dates in this case shall remain the same.

8 NOW THEREFORE, the Parties request that the Court reset the December 13, 2011
9 hearing on Plaintiffs' Motion to **May 3, 2012** or the first available hearing date thereafter.

10 IT IS SO STIPULATED.

11 DATED: October 11, 2011

SEYFARTH SHAW LLP

12
13 By s/ Eric M. Steinert
Eric M. Steinert
Justin T. Curley

14
15 Attorneys for Defendants
16 UNIONBANCAL CORPORATION
and UNION BANK, N.A.

17
18 DATED: October 11, 2011

ALEXANDER KRAKOW + GLICK LLP

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20 By s/ Michael S. Morrison
Marvin E. Krakow
Michael S. Morrison

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25 By s/ Douglas B. Hayes
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27 Attorneys for Plaintiff
28 LYNN ODRICK

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ORDER

GOOD CAUSE APPEARING, it is hereby ORDERED, ADJUDGED, and DECREED

that:

1. The Parties shall file a stipulation to amend the complaint to add the new plaintiffs by November 11, 2011;
2. Plaintiff's Motion for Class Certification shall be due on March 1, 2012;
3. Defendants' opposition to Plaintiff's Motion for Class Certification shall be due on March 29, 2012;
4. Plaintiff's reply brief in support of her Motion for Class Certification shall be due on April 12, 2012; and
5. Plaintiff's Motion for Class Certification shall be heard on **May 8, 2012 at 1:00 p.m.**

IT IS SO ORDERED.

Dated: 10/12/11



Hon. Sandra Brown Armstrong