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17 IN THE UNITED STATES DISTRICT COURT
18 FOR THE NORTHERN DISTRICT OF CALIFORNIA
19 OAKLAND DIVISION

20 ALEX ANG and LYNNE STREIT,
21 individually and on behalf of all others
similarly situated,

22 Plaintiffs,

23 v.

24 BIMBO BAKERIES USA, INC.,

25 Defendant.

Case No. 3:13-CV-1196-HSG

**STIPULATION EXTENDING PRE-TRIAL
SCHEDULE; ~~PROPOSED~~ ORDER**

Judge: Hon. Haywood S. Gilliam, Jr.
Action Filed: March 18, 2013

1 Pursuant to Northern District Rule 6-2, and subject to the Court’s approval, Plaintiffs Alex
2 Ang and Lynne Streit (collectively, “Plaintiffs”) and defendant Bimbo Bakeries U.S.A., Inc.
3 (“Defendant”) (collectively “the Parties”) respectfully submit the following Stipulation and
4 proposed Order:

5 WHEREAS, the Parties are actively engaged in productive settlement negotiations;

6 WHEREAS, the Parties have stipulated to private ADR, with a deadline of August 30,
7 2019, which the Court approved on May 31, 2019 (Doc. 207);

8 WHEREAS, Defendant designated expert witnesses on June 4, 2019;

9 WHEREAS, the deadline for the Parties to designate rebuttal expert witnesses is July 5,
10 2019, and the deadline for expert discovery is August 5, 2019;

11 WHEREAS, the Parties have agreed to schedule a mediation before the Hon. Phillip M.
12 Pro (Ret.) on July 31, 2019;

13 WHEREAS, counsel for the Parties have agreed that, in written mediation statements to
14 be exchanged, Plaintiffs will identify any rebuttal expert witnesses they may designate;

15 WHEREAS, counsel for the Parties believe that a modest extension of the pre-trial
16 schedule, including the date for rebuttal expert witness disclosures, will allow the Parties to
17 conduct ADR before engaging in expert discovery and enable the Parties to avoid significant
18 expense;

19 WHEREAS, there has been one extension of the pretrial schedule in this action (Doc.
20 200); and

21 WHEREAS, the Parties agree that a further, modest, extension of the pre-trial schedule is
22 warranted and will increase the likelihood of achieving a consensual resolution of this action.

23 THEREFORE, subject to the Court’s approval, the Parties stipulate to the following
24 extensions of the pre-trial and trial schedule and respectfully request that the Court enter the
25 accompanying proposed Order:

26 Deadline to exchange rebuttal expert reports August 14, 2019

27 Expert discovery deadline September 30, 2019

1	Last day to file motion to compel expert discovery	October 14, 2019
2	Deadline to file dispositive motions	October 21, 2019
3	Deadline for opposition to dispositive motions	November 18, 2019
4	Deadline for replies to dispositive motions	December 16, 2019
5	Dispositive motion hearing deadline	January 13, 2020
6	Trial	March 27, 2020

8 Dated: June 28, 2019

9 /s/ Pierce Gore
10 Ben F. Pierce Gore (SBN 128515)
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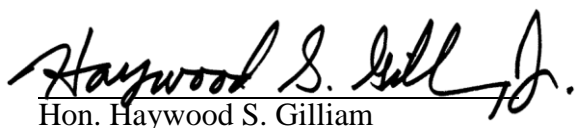
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26 *Attorneys for Defendant*

27 **~~PROPOSED~~ ORDER**

28 Pursuant to Stipulation of the parties, and good cause appearing therefor, the Court hereby approves the Stipulation and enters it as an Order of the Court.

29 Dated: 7/1/19


Hon. Haywood S. Gilliam
United States District Judge

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ECF ATTESTATION

I, Mark C. Goodman, am the ECF User whose ID and password are being used to file the following: **STIPULATION EXTENDING PRE-TRIAL SCHEDULE; [PROPOSED] ORDER**. In compliance with General Order 45, I hereby attest that Pierce Gore has concurred in this filing.

Dated: June 28, 2019

/s/ Mark C. Goodman
Mark C. Goodman