Kumar v. Salov North America Corp et al

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Plaintiff Rohini Kumar ("Plaintiff") and Defendant Salov North America Corp. ("Defendant") hereby stipulate as follows:

WHEREAS, on December 15, 2015, the Court set a briefing schedule for class certification as follows: Plaintiff shall file the Motion for Class Certification no later than January 19, 2016; Defendant's Opposition shall be filed no later than February 23, 2016; Plaintiff's Reply shall be filed no later than March 22, 2016; and hearing on the motion for class certification is set for April 12, 2016, at 2:00p.m. [Dkt. #77];

WHEREAS, on January 19, 2016, concurrently with her Motion for Class Certification, Plaintiff filed the Declaration of Colin B. Weir, her damages expert, in support thereof [Dkt. # 84-35-38];

WHEREAS, on January 26, 2016, Defendant served a subpoena requesting a deposition of Colin B. Weir on February 9, 2016, as well as the production of documents used or relied upon by Mr. Weir in connection with preparing his report;

**WHEREAS,** on January 28, 2016, Plaintiff informed Defendant that Mr. Weir is unavailable for deposition the week of February 8, 2016 and stated that Mr. Weir was unavailable prior to February 16, 2016 for a deposition;

**WHEREAS**, on January 28, 2016, counsel for Defendant informed Plaintiff that they were unavailable on February 16, 2016, and proposed alternative deposition dates for that week, and requested the production of Mr. Weir's documents in advance of the deposition;

**WHEREAS**, on February 2, 2016, Plaintiff informed Defendant that Mr. Weir is travelling outside of the United States until February 8, 2016, which has complicated scheduling and production of documents, and that Mr. Weir was not available on alternative dates proposed by Defendant;

**WHEREAS**, at the earliest, Mr. Weir appears to be available for deposition on February 23 or 24, 2016, and counsel for the parties have agreed for it to occur on February 24, 2016:

**WHEREAS**, to allow Defendant an opportunity to examine Mr. Weir adequately in advance of the due date of their opposition, the parties have met and conferred and

respectfully request a short extension of the class certification briefing schedule by three weeks;

NOW, THEREFORE, IT IS STIPULATED, by and between the undersigned parties, though their respective counsel of record, pursuant to Rule 6 and Local Civil Rules 6-1(b) and 2(a), and consistent with the Court's civility guidelines, that the Court set the following deadlines regarding class certification:

Event	Current Deadline	New Deadline
Defendant's Opposition to Class Certification Due	February 23, 2016	March 15, 2016
Plaintiff's Reply in Support Class Certification Due	March 22, 2016	April 12, 2016
Hearing on Motion for Class Certification	April 12, 2016 at 2:00 p.m.	May 3, 2016 May 10, 2016 at 2pm

Dated: February 8, 2016 SIDLEY AUSTIN LLP

By: /s/Sean A. Commons\*
Sean A. Commons
Attorneys for Defendant
SALOV NORTH AMERICA CORP., INC.

Dated: February 8, 2016 GUTRIDE SAFIER LLP

By: /s/Adam Gutride
Adam Gutride
Attorneys for Plaintiff
ROHINI KUMAR

\* Filer attests that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

## [PROPOSED] ORDER Pursuant to Local Civil Rule 6-2(a), and GOOD CAUSE APPEARING Grene Gyalfleeg February 9, 2016