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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

21 SHANA GUDGEL, on behalf of herself and all
 22 others similarly situated,
 23 Plaintiff,
 24 v.
 25 THE CLOROX COMPANY,
 26 Defendant.

Civil Case No. 4:20-cv-05712-~~KAW~~ PJH

**STIPULATION ENLARGING TIME TO
 RESPOND TO COMPLAINT;
 STIPULATED REQUEST TO ENLARGE
 TIME TO BRIEF FORTHCOMING
 MOTION TO DISMISS; ~~PROPOSED~~
 ORDER**

1 Pursuant to Civil L.R. 6-1(a), Defendant The Clorox Company (“Clorox”) and Plaintiff Shana
2 Gudel (collectively, the “Parties”) respectfully submit the following Stipulation (Without Court Order)
3 Enlarging Time to Respond to the Complaint.

4 Pursuant to Civil L.R. 6-1(b) and 6-2, the Parties also respectfully submit the following
5 Stipulated Request to Enlarge Time to Brief Clorox’s Forthcoming Motion to Dismiss.
6

7 **STIPULATION**

8 WHEREAS, on August 14, 2020, Plaintiff filed the initial complaint (Dkt. 1);

9 WHEREAS, pursuant to Federal Rule of Civil Procedure 12, Clorox’s response to the initial
10 complaint would be due by September 8, 2020 (*see* Dkt. 11);

11 WHEREAS, Clorox has informed Plaintiff that it intends to move to dismiss the initial
12 complaint; and

13 WHEREAS, pursuant to Civil L.R. 6-1(a), which allows parties to stipulate in writing without
14 court order to extend a defendant’s time within which to answer or otherwise respond to a complaint, the
15 Parties have conferred and agree that Clorox shall file its motion to dismiss the initial complaint by
16 October 8, 2020.

17 THEREFORE, the Parties, by and through their respective undersigned counsel, hereby stipulate
18 and agree that Clorox shall have until October 8, 2020, to file its motion to dismiss the initial complaint.
19

20 **STIPULATED REQUEST**

21 WHEREAS, the Parties agree that resolution of Clorox’s forthcoming motion to dismiss would
22 benefit from extending the opposition deadline by two weeks and the reply deadline by one week;
23

24 WHEREAS, the Parties have stipulated and agreed that Clorox shall have until October 8, 2020,
25 to move to dismiss the initial complaint;

26 WHEREAS, there have been no other time modifications in this case;

27 WHEREAS, no events or deadlines already fixed by Court order would be affected by the time
28

1 modification requested herein; and

2 WHEREAS, Clorox does not waive, and expressly reserves, all defenses.

3 THEREFORE, the Parties, by and through their respective undersigned counsel, hereby stipulate
4 and agree to, and respectfully request that the Court order, the following deadlines:
5

6 • Plaintiff shall have until November 5, 2020, to file an opposition to Clorox's forthcoming
7 motion to dismiss the initial complaint; and

8 • Clorox shall have until November 19, 2020, to file a reply in support of its forthcoming
9 motion to dismiss the initial complaint.

10
11 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

12
13
14 DATED: September 15, 2020

By: Phyllis J. Hamilton

~~Hon. Kandis A. Westmore~~
~~United States Magistrate Judge~~
U.S. District Court Judge

15
16 DATED: September 3, 2020

Respectfully submitted,

17
18 /s/ Emily Johnson Henn

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Attorneys for Plaintiff

1 **FILER'S ATTESTATION**

2 Pursuant to Civil L.R. 5-1(i)(3), Emily Johnson Henn hereby attests that concurrence in the filing
3 of this document has been obtained from each of the above signatories.

4
5 Dated: September 3, 2020

By: /s/ Emily Johnson Henn

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