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Counsel Appear on the Following Page

**\*E-FILED - 4/30/09\***

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

Mohan Gil, et al, on behalf of others  
similarly situated, and on behalf of the  
general public,

Plaintiffs,

v.

Solectron Corporation, et al,

Defendants.

Case No. C 07-06414 RMW (HRL)

**JOINT STIPULATION AND [ ]  
ORDER ABATING PRETRIAL DEADLINES  
AND SETTING CASE MANAGEMENT  
CONFERENCE**

Honorable Ronald M. Whyte  
Complaint Filed: December 19, 2007

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Attorneys for DEFENDANTS SOLECTRON CORPORATION, FLEXTRONICS  
INTERNATIONAL, USA, INC., and AEROTEK, INC.

1 Plaintiffs MOHAN GIL, RODNEY CARR, TONY DANIEL, and JERMAINE WRIGHT,  
2 individually, on behalf of others similarly situated, and on behalf of the general public  
3 (“Plaintiffs”) and Defendants SOLECTRON CORPORATION, FLEXTRONICS  
4 INTERNATIONAL, USA, INC., and AEROTEK, INC. (referred to herein collectively as  
5 “Defendants”), hereby stipulate and agree as follows:  
6

7 WHEREAS, on July 16, 2008, the Court adopted the parties’ stipulation regarding  
8 Plaintiffs’ First Amended Complaint, which included a request for a Case Management  
9 Conference to discuss the current pretrial schedule; and

10 WHEREAS, the Court has not set a Case Management Conference to discuss the current  
11 pretrial schedule; and

12 WHEREAS, the Court granted Plaintiffs’ motion for conditional class certification on  
13 January 9, 2009; and

14 WHEREAS, Defendants recently selected new counsel to represent them in this matter;  
15 and

16 WHEREAS, Defendants produced a class list to Plaintiffs on Friday, March 27, 2009; and

17 WHEREAS, the class list includes approximately 17,500 employees; and

18 WHEREAS, because of the size of the list, Plaintiffs expect they will be able to distribute  
19 notice within the next two weeks; and

20 WHEREAS, the parties anticipate an opt-in period that will extend into July 2009; and

21 WHEREAS, the current pretrial schedule includes a deadline of April 1, 2009 for expert  
22 disclosures, a deadline of May 1, 2009 for Plaintiffs to file their Rule 23 Class Certification  
23 motion, and a deadline of June 1, 2009 for the close of discovery; and

24 WHEREAS, there have been no previous modifications of the discovery deadlines or trial  
25 date in this matter;

26 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED that:

27 1) The parties jointly request that the deadlines in the current pretrial schedule,  
28 docket number 48, shall be abated.

1           2)     The parties jointly request a case management conference on July 10, 2009, at  
2 10:30 a.m.

3           3)     The parties agree to submit a proposed case management order by June 26, 2009.  
4

5 Dated: March 31, 2009

**NICHOLS KASTER, LLP**

6 By: s/ Matthew C. Helland  
7 Matthew C. Helland

8 ATTORNEYS FOR PLAINTIFFS AND  
9 THE PUTATIVE CLASSES

10 Dated: March 31, 2009

**WINSTON & STRAWN LLP**

11 By: s/ Jennifer Rappoport  
12 Joan B. Tucker Fife  
13 Jennifer Rappoport

14 Attorneys for DEFENDANTS  
15 SOLECTRON CORPORATION,  
16 FLEXTRONICS INTERNATIONAL, USA,  
17 INC., and AEROTEK, INC.

18 **ORDER**

19 Having read the foregoing Stipulation of the parties, and good cause appearing therefore,

20 **IT IS SO ORDERED.**

21 Dated: 4/30/09

*Ronald M. Whyte*

22 Hon. Ronald M. Whyte  
23 United States District Court Judge  
24  
25  
26  
27  
28