\*E-Filed 5/4/11\* 1 REESE RICHMAN LLP Michael R. Reese (Cal. State Bar No. 206773) 2 mreese@reeserichman.com 875 Avenue of the Americas, 18<sup>th</sup> Floor New York, New York 10001 Tel: (212) 579-4625 Fax: (212) 253-4272 5 Counsel for Plaintiff Robert Chacanaca 6 7 UNITED STATES DISTRICT COURT 8 NORTHERN DISTRICT OF CALIFORNIA 9 SAN FRANCISCO DIVISION 10 11 ROBERT CHACANACA, et al, on behalf of Case No. 10-cv-00502 RS themselves and all others similarly situated, 12 JOINT STIPULATION AND Plaintiff, (PROPOSED) ORDER TO 13 **ADJOURN HEARING FROM** JUNE 2, 2011 TO JUNE 9, 2011 VS. 14 THE QUAKER OATS COMPANY, 15 Defendant. 16 17 18 19 20 21 22 23 24 25 26 27 28

JOINT STIPULATION [AND] PROPOSED ORDER ADJOURNING HEARING

10-cv-00502 RS

1	Plaintiffs Robert Chacanaca, Victor Guttman, Kelly Bruno, Rebecca Yumul, Elaine
2	Pelobello, and Sonya Yrene ("Plaintiffs") and defendant The Quaker Oats Company
3	("Defendant") (collectively, the "Parties"), hereby stipulate as follows:
4	WHEREAS, Reese Richman LLP filed a notice of appearance on behalf on Plaintiff
5	Robert Chacanaca in the above-captioned action on May 2, 2011;
6	WHEREAS, the Court has scheduled a hearing for June 2, 2011 to determine which
7	firms, if any, should be appointed interim lead counsel in the above-captioned matter;
8	WHEREAS, Reese Richman LLP indicated to the Parties on May 3, 2011 it will file a
9	motion for appointment of Reese Richman LLP as interim lead counsel;
10	WHEREAS, Northern District of California Local Rule 7-2 requires the filing and service
11	of any motion at least 35 days before the date set for hearing;
12	WHEREAS, the earliest Reese Richman LLP could set a hearing for its motion for
13	appointment as interim lead-counsel is June 9, 2011;
14	WHEREAS, the Parties agree that judicial economy and efficiency are best achieved by
15	having all motions for interim lead counsel heard at the same time; and
16	THE PARTIES HEREBY AGREE AND STIPULATE, UPON PERMISSION OF THE
17	COURT, AS FOLLOWS:
18	The hearing on any motions for consolidation and appointment of interim lead counsel
19	currently scheduled for 1:30 p.m. on June 2, 2011 is adjourned to 1:30 p.m. on June 9, 2011.
20	STIPULATED TO BY THE FOLLOWING THIS 4th DAY OF MAY, 2011:
21	REESE RICHMAN LLP
22	/s/ Michael R. Reese
23	Michael R. Reese (Cal. State Bar No. 206773) mreese@reeserichman.com
24	875 Avenue of the Americas, 18 <sup>th</sup> Floor New York, New York 10001
25	Telephone: (212) 579-4625 Facsimile: (212) 253-4272
<ul><li>26</li><li>27</li></ul>	Counsel for Plaintiff Robert Chacanaca
28	
20	

Joint Stipulation and [Proposed] order adjourning Hearing 10-cv-00502 RS  $\phantom{\bigg|}$  -  $\phantom{\bigg|}$  -  $\phantom{\bigg|}$  -  $\phantom{\bigg|}$  -  $\phantom{\bigg|}$ 

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21	Counsel for Defendant The Quaker Oats Company
22	
23	[PROPOSED] ORDER
24	PURSUANT TO THE PARTIES' STIPULATION, AND GOOD CAUSE SHOWN, IT IS SO
25	ORDERED THAT THE HEARING CURRENTLY SCHEDULED FOR 1:30 P.M. ON JUNE 2,
26	2011 IS HEREBY ADJOURNED TO 1:30 P.M. ON JUNE 9, 2011.
27	DATED: _5/4/11
28	Richard Seeborg
40	United States District Judge

joint stipulation and [Proposed] order adjourning hearing  $_{\rm 10\text{-}ev\text{-}00502}\,\text{Rs}$  -3 -