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7 Attorneys for Defendant
 MCAFEE, INC.
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9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN JOSE DIVISION

13 MELISSA FERRINGTON and CHERYL
 SCHMIDT,
 14 Plaintiffs,
 15
 v.
 16 MCAFEE, INC.,
 17 Defendant.
 18

Case No. CV-10-01455 LHK (HRL)

**JOINT STIPULATION AND [~~PROPOSED~~]
 ORDER RE SCHEDULING**

Complaint Filed: April 6, 2010
 Trial Date: None
 Judge: Hon. Lucy H. Koh

19 Plaintiffs Melissa Ferrington and Cheryl Schmidt (“Plaintiffs”) and Defendant
 20 McAfee, Inc. (“McAfee”), by and through their counsel, subject to the Court’s approval,
 21 STIPULATE AS FOLLOWS:

22 WHEREAS, the parties engaged The Honorable Ronald M. Sabraw (Ret.) of
 23 JAMS to mediate their dispute and the parties appeared before Judge Sabraw on January 13, 2011
 24 for a full-day mediation; and

25 WHEREAS, the parties made some progress in their discussions at the mediation,
 26 but did not reach a settlement; and

27 WHEREAS, subsequent to the mediation, the parties have continued their
 28 settlement discussions via several telephone conferences between counsel and the parties have

1 determined that certain information in the possession of third parties is necessary to allow those
2 discussions to move forward; and

3 WHEREAS, under the current pretrial schedule set by the Court, plaintiffs' motion
4 for class certification must be filed on or before March 10, 2011; and

5 WHEREAS, before the class motion may be filed, certain discovery must be
6 obtained, including depositions of the named plaintiffs and depositions of McAfee personnel; and

7 WHEREAS, plaintiffs intend to seek leave to amend their complaint to add claims
8 and additional parties; and

9 WHEREAS, the parties would like to adjust the pretrial schedule to allow
10 additional time for settlement discussions before expensive litigation continues and have agreed
11 to a four-week extension of the schedule to allow for same.

12 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY AND
13 BETWEEN THE PARTIES that, subject to the Court's approval:

14 The dates and deadlines entered by the Court on September 28, 2010 (and
15 extended by stipulated order on December 6, 2010), shall be extended for four weeks, as follows:

16
17 CLASS CERTIFICATION MOTION shall be filed by April 7, 2011 and set for a hearing no later
18 than May 12, 2011, at 1:30 p.m.

19 FURTHER CASE MANAGEMENT CONFERENCE is rescheduled for immediately following
20 the hearing on the class certification motion.

21 DEADLINE TO AMEND THE PLEADINGS is July 5, 2011.

22 FACT DISCOVERY CUT-OFF is September 2, 2011.

23 EXPERT DISCOVERY CUT-OFF is October 21, 2011.

24 DISPOSITIVE MOTIONS shall be filed by November 10, 2011, and set for hearing no later than
25 December 15, 2011, at 1:30 p.m.

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Dated: February 2, 2011

STEIN & LUBIN LLP

/s/ Daniel K. Slaughter

By: _____
Daniel K. Slaughter
Counsel for Defendant McAfee, INC.

Dated: February 2, 2011

COHEN MILSTEIN SELLERS & TOLL PLLC

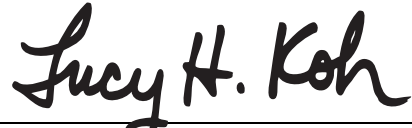
/s/ Andrew N. Friedman

By: _____
Andrew N. Friedman
Counsel for Plaintiffs

[PROPOSED] ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: February 7, 2011 _____



Honorable Lucy H. Koh
Judge of the United States District Court