

** E-filed September 28, 2011 **

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6 Attorneys for Defendant
 PrO Unlimited, Inc.

8 IN THE UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION

10 MICHAEL LAZARIN, STEPHEN KOHLER,
 11 and PAUL CAPANO, individually and on
 behalf of other members of the general public
 12 similarly situated, and as aggrieved employees
 pursuant to the Private Attorneys General Act
 13 (“PAGA”)

14 Plaintiffs,

15 v.

16 PRO UNLIMITED, INC., JUNIPER
 NETWORKS, INC., JUNIPER
 17 NETWORKS HOLDINGS
 INTERNATIONALO, INC., and JUNIPER
 18 NETWORKS (US), INC.

19 Defendants.

Case No. 5:11-CV-03609-HRL

**JOINT STIPULATION TO EXTEND TIME
 FOR FILING RULE 26(f) REPORT, INITIAL
 DISCLOSURES, AND CMC CONFERENCE;
 AND ~~PROPOSED~~ ORDER**

(AS MODIFIED BY THE COURT)

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 21 TO THE HONORABLE COURT AND TO ALL PARTIES AND COUNSEL:

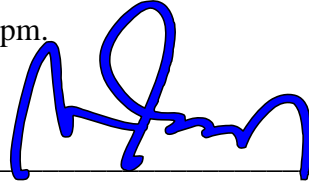
22 WHEREFORE, pursuant to Federal Rule of Civil Procedure 16(b)(4), and for good cause,
 23 plaintiffs Michael Lazarin, Stephen Kohler, and Paul Capano (“Plaintiffs”), and defendant PrO
 24 Unlimited, Inc. (“Defendant”), by and through their respective attorneys of record, hereby jointly
 25 stipulate and request that the Court vacate the dates set forth in the Order Setting Initial Case
 26 Management Conference and ADR Deadlines filed on July 22, 2011, and that the Court continue
 27 such dates as set forth in the stipulation below. The reason for this request and stipulation is that
 28 Defendant recently retained new counsel and filed a Notice of Withdrawal and Substitution of

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FOR GOOD CAUSE, IT IS HEREBY ORDERED AS FOLLOWS:

1. The current deadline of September 27, 2011, to file the Rule 26(f) Report, to complete initial disclosures, to state objections in the Rule 26(f) Report, and to file a Case Management Statement per the Court's Standing Order re Contents of Joint Case Management Statement, is hereby continued ~~for 30 calendar days to October 27, 2011;~~ **November 15, 2011**;
2. The current deadline of September 27, 2011, to file a joint case management statement, is hereby continued ~~for 30 calendar days to October 27, 2011;~~ and **November 15, 2011**;
3. The Initial Case Management Conference presently set for October 4, 2011, is hereby continued to ~~November 3, 2011,~~ **November 22, 2011** at 1:30 pm.

Dated: September 28, 2011



HONORABLE HOWARD R. LLOYD
MAGISTRATE JUDGE OF THE
UNITED STATES DISTRICT COURT

4812-1623-7067, v. 1

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C 11-03609 HRL Notice will be electronically mailed to:

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