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**** E-filed November 23, 2011 ****

Attorneys for Defendant
PrO Unlimited, Inc.

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

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

Plaintiffs,

v.

PRO UNLIMITED, INC., JUNIPER
NETWORKS, INC., JUNIPER
NETWORKS HOLDINGS
INTERNATIONAL, INC., and JUNIPER
NETWORKS (US), INC.

Defendants.

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

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

TO THE HONORABLE COURT AND TO ALL PARTIES AND COUNSEL:

WHEREFORE, pursuant to Federal Rule of Civil Procedure 16(b)(4), and for good cause,
plaintiffs Michael Lazarin, Stephen Kohler and Paul Capano ("Plaintiffs"), and defendants PrO
Unlimited, Inc. ("PrO"), Juniper Networks, Inc., Juniper Network Holdings International, Inc.,
and Juniper Networks (US), Inc., by and through their respective attorneys of record, hereby
jointly stipulate and request the Court to vacate the dates set forth in the Order granting the Joint
Stipulation to Extend Time for Filing Rule 26(f) Report, Initial Disclosures, and CMC
Conference, filed on September 28, 2011, and in the Clerk's Notice of Continuing Case

1 Management Conference filed on November 14, 2011, and to continue such dates as set forth in
2 the stipulation below. Plaintiffs and Defendants currently are exploring the prospects for possible
3 early settlement and/or mediation. Last week Defendant PrO voluntarily produced data and
4 documents to facilitate potential settlement and/or mediation. Defendant Juniper Network, Inc.
5 ("Juniper") made its first appearance on November 7, 2011; on November 22, 2011, the parties
6 filed a stipulation and order to dismiss the named Defendants Juniper Networks Holdings
7 International, Inc. and Juniper Networks (US). The parties respectfully request additional time to
8 focus on streamlining the litigation.

9 WHEREFORE, the parties hereby jointly stipulate and request as follows:

- 10 1. The current deadline of November 22, 2011, to file the Rule 26(f) Report, to
11 complete initial disclosures, to state objections in the Rule 26(f) Report, and to file
12 a Case Management Statement per the Court's Notice Continuing Case
13 Management Conference filed on November 14, 2011, be continued to January 17,
14 2012;
- 15 2. The current deadline of November 22, 2011, to file a joint case management
16 statement, be continued to January 17, 2012; and
- 17 3. The Initial Case Management Conference presently set for November 29, 2011, be
18 continued to January 24, 2012.

19 IT IS SO STIPULATED.

20 Date: November 22, 2011

RUKIN HYLAND DORIA & TINDALL LLP

21 By: /s/

22 Peter Rukin
Attorneys for Plaintiffs

23 Date: November 22, 2011

JACKSON LEWIS LLP

24 By: /s/

25 Cary G. Palmer
Attorneys for Defendant
26 PrO Unlimited, Inc.

1 Date: November 22, 2011

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

2 By: /s/

3 Baldwin J. Lee
4 Attorneys for Defendant
5 Juniper Networks, Inc., Juniper Network
Holdings, International, Inc. and Juniper
6 Networks (US), Inc.

7 FOR GOOD CAUSE, IT IS HEREBY ORDERED AS FOLLOWS:

- 8 1. The current deadline of November 22, 2011, to file the Rule 26(f) Report, to
9 complete initial disclosures, to state objections in the Rule 26(f) Report, and to file
10 a Case Management Statement be continued to January 17, 2012;
11 2. The current deadline of November 22, 2011, to file a joint case management
12 statement, be continued to January 17, 2012; and
13 3. The Initial Case Management Conference presently set for November 29, 2011, be
14 continued to January 24, 2012.

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16 Dated: November 23, 2011


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

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