

**** E-filed January 19, 2012 ****

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6 Attorneys for Defendant
 PrO Unlimited, Inc.

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

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

14 Plaintiffs,

15 v.

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

19 Defendants.
 20
 21

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**

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

23 WHEREFORE, pursuant to Federal Rule of Civil Procedure 16(b)(4), and for good cause,
 24 plaintiffs Michael Lazarin, Stephen Kohler and Paul Capano (“Plaintiffs”), and defendants PrO
 25 Unlimited, Inc. (“PrO”), Juniper Networks, Inc., Juniper Network Holdings International, Inc.,
 26 and Juniper Networks (US), Inc., by and through their respective attorneys of record, hereby
 27 jointly stipulate and request the Court to vacate the dates set forth in the Order granting the Joint
 28 Stipulation to Extend Time for Filing Rule 26(f) Report, Initial Disclosures, and CMC

1 Conference, filed on November 23, 2011, and to continue such dates as set forth in the stipulation
2 below.

3 The parties are continuing to explore early class-wide resolution and have reached a
4 tentative understanding. As a result, the parties respectfully request additional time to focus on
5 final resolution of this case.

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

- 7 1. The current deadline of January 17, 2012, to file the Rule 26(f) Report, to
8 complete initial disclosures, to state objections in the Rule 26(f) Report, and to file
9 a Case Management Statement, be continued to March 20, 2012;
- 10 2. The current deadline of January 17, 2012, to file a joint case management
11 statement, be continued to March 20, 2012; and
- 12 3. The Initial Case Management Conference presently set for January 24, 2012, be
13 continued to March 27, 2012.

14 IT IS SO STIPULATED.

15 Date: January 18, 2012 RUKIN HYLAND DORIA & TINDALL LLP

16 By: /s/ [Peter Rukin] as approved on 1/18/12
17 Peter Rukin
Attorneys for Plaintiffs

18 Date: January 18, 2012 JACKSON LEWIS LLP

19 By: /s/ [Cary G. Palmer]
20 Cary G. Palmer
Attorneys for Defendant
21 PrO Unlimited, Inc.

22 Date: January 18, 2012 ALLEN MATKINS LECK GAMBLE
23 MALLORY & NATSIS LLP

24 By: /s/ [Baldwin J. Lee] as approved on 1/18/12
25 Baldwin J. Lee
Attorneys for Defendant
26 Juniper Networks, Inc., Juniper Network
Holdings, International, Inc. and Juniper
Networks (US), Inc.

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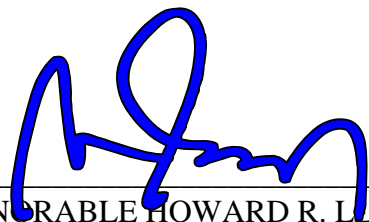
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FOR GOOD CAUSE, IT IS HEREBY ORDERED AS FOLLOWS:

1. The current deadline of January 17, 2012, 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 be continued to March 20, 2012;
2. The current deadline of January 20, 2012, to file a joint case management statement, be continued to March 20, 2012; and
3. The Initial Case Management Conference presently set for January 24, 2012, be continued to March 27, 2012.

Dated: January 19, 2012



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