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7 Attorneys for Defendant  
 THE HAIN CELESTIAL GROUP, INC.  
 8

9 UNITED STATES DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA  
 11 SAN JOSE DIVISION

13 BARBARA ANDERSON, on behalf of  
 herself and all others similarly situated,  
 14  
 Plaintiff,  
 15  
 v.  
 16 THE HAIN CELESTIAL GROUP, INC., and  
 17 DOES 1 through 10, inclusive,  
 18  
 Defendants.

Case No. C 14-03895 EJD

**CLASS ACTION**

**JOINT STIPULATION TO CONTINUE  
 CASE MANAGEMENT CONFERENCE  
 AND EXTEND DEFENDANT'S TIME TO  
 ANSWER THE FIRST AMENDED  
 COMPLAINT**

1 Plaintiff Barbara Anderson (“Plaintiff”), on behalf of herself and all others similarly  
2 situated, and Defendant The Hain Celestial Group, Inc. (“Hain” or “Defendant”), through their  
3 undersigned counsel, hereby stipulate as follows:

4 WHEREAS, on November 11, 2014, Ms. Anderson filed her First Amended Complaint  
5 (“FAC”) in this action;

6 WHEREAS, on January 12, 2015, Hain moved to the dismiss the FAC;

7 WHEREAS, on April 8, 2015, the Court granted in part and denied in part Hain’s motion,  
8 and ordered Hain to answer the FAC within 15 days of its Order on April 23, 2015 (Dkt. No. 46);

9 WHEREAS, on April 8, 2015, the Court ordered the parties to submit a Joint Case  
10 Management Statement on May 14, 2015, and scheduled a Case Management Conference for  
11 May 21, 2015;

12 WHEREAS, on April 17, 2015, the Court granted the parties’ joint stipulation to extend  
13 Hain’s time to answer the FAC to May 28, 2015 (Dkt. No. 48);

14 WHEREAS, the parties were contemplating submitting a joint stipulation to stay the  
15 action pending the Ninth Circuit’s decisions in *Jones v. ConAgra* and *Brazil v. Dole*;

16 WHEREAS, on May 12, 2015, the Court granted the parties’ joint stipulation to continue  
17 the case management conference to June 25, 2015 and extend Hain’s time to answer the FAC  
18 until July 2, 2015;

19 WHEREAS, despite their negotiations and a general agreement to stay this action pending  
20 the Ninth Circuit’s decisions in *Jones v. ConAgra* and *Brazil v. Dole*, the parties were unable to  
21 agree to the precise terms and parameters of a stay;

22 WHEREAS, Hain now intends to file a motion to stay the action pending those decisions;

23 WHEREAS, Plaintiff intends to not oppose a stay but, instead, request that the Court  
24 establish reasonable terms and parameters of a stay, including as to matters that may be  
25 implicated or otherwise affected by a stay;

26 WHEREAS, the parties agree to continue the Case Management Conference and extend  
27 Hain’s time to answer the FAC until after the Court rules on Hain’s motion to stay the action.

28 THE PARTIES HEREBY STIPULATE, subject to the approval of the Court, that:

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- The Case Management Conference is continued pending the Court’s ruling on Hain’s motion to stay the action. Should the motion be denied, the Court shall set a new date for the Case Management Conference and related deadline for submission of a Joint Case Management Statement.
- Hain’s deadline to answer the FAC shall be extended accordingly.

Dated: June 17, 2015

WILLIAM L. STERN  
JAMES M. SCHURZ  
KEVIN M. COLES  
MORRISON & FOERSTER LLP

By: /s/ James M. Schurz  
JAMES M. SCHURZ

Attorneys for Defendant  
THE HAIN CELESTIAL GROUP, INC.

Dated: June 17, 2015

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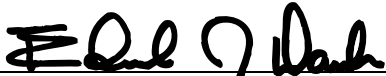
By: /s/ Chant Yedalian  
CHANT YEDALIAN

Attorney for Plaintiff Anderson

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION OF THE PARTIES, IT IS SO ORDERED.  
The Motion to Stay shall be noticed for September 24, 2015 at 9:00 AM

DATED: 6/18/2015

  
THE HONORABLE EDWARD J. DAVILA  
United States District Court Judge

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**ECF ATTESTATION**

I, Kevin M. Coles, am the ECF User whose ID and password are being used to file the following: **JOINT STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE AND EXTEND DEFENDANT’S TIME TO ANSWER THE FIRST AMENDED COMPLAINT.** In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Chant Yedalian and James M. Schurz have concurred in this filing.

Dated: June 17, 2015

WILLIAM L. STERN  
JAMES M. SCHURZ  
KEVIN M. COLES  
MORRISON & FOERSTER LLP

By:  /s/ Kevin M. Coles  
KEVIN M. COLES