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9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 BROOKE CARDOZA et al.,

13 Plaintiffs,

14 vs.

15 BLOOMIN' BRANDS, INC. et al.,

16 Defendants.
17

CASE NO.: 2:13-cv-01820-JAD-NJK

STIPULATION AND ~~(PROPOSED)~~
ORDER IN RESPONSE TO COURT'S
ORDER (DOCKET NO. 384)
(Second Request)

18 The parties now approach the Court in response to its Order, Doc.#384, on Plaintiffs' recent
19 Motion to Compel, Doc.#362.

20 In its Order, the Court required the parties to "confer in light of the guidance provided" in
21 the Order, and to file by October 30 a "joint stipulated proposal" for conduct of further discovery.

22 The Court then granted the parties' previous joint Stipulation to extend the October 30
23 deadline to November 13. Doc.#391. The parties now seek a second and final one-week extension
24 to November 20. As grounds for a further extension, the parties state:

- 25 • Consonant with the Court's guidance, the parties have continued to engage in substantial
26 meet-and-confer conferences.
- 27 • Plaintiffs' and Defense counsel met in person last week in Los Angeles to discuss a
28 proposal for discovery. There was general agreement as to the proposal. Defense counsel

1 drafted a joint report based on the conference. That draft was provided to Plaintiffs' counsel
2 on November 10. Also on November 10, one of the Plaintiffs' lawyers negotiating this
3 proposal was hospitalized.

- 4 • The parties have agreed as follows:
 - 5 ○ Plaintiffs will respond to Defendants by close of business Tuesday, November 17
 - 6 with comments and additions to the draft joint report.
 - 7 ○ Defendants will respond to Plaintiffs by close of business Thursday, November 19
 - 8 with their comments.
 - 9 ○ The parties will attempt to reach final agreement Friday, November 20 and will file
 - 10 the joint report by the end of that day.
- 11 • Plaintiffs' counsel requested the additional time sought. Defendants' counsel agreed to the
- 12 extension. Counsel for all parties believe that this additional time will be put to good use
- 13 and that the extent of agreement between the parties appears greater if there is more time to
- 14 work.

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1 If the Court prefers a motion to be filed in lieu of a stipulation, the parties will do so
2 promptly.

3 DATED this 12th day of November, 2015.

DATED this 12th day of November, 2015.

4 /s/ Don Springmeyer

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Inc.; OSI Restaurant Partners, LLC; Outback
Steakhouse of Florida, LLC; OS Restaurant
Services, LLC

ORDER

IT IS SO ORDERED.

Dated: November 13, 2015


UNITED STATES MAGISTRATE JUDGE