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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RENEE FASSBENDER AMOCHAEV,
DEBORAH ORLANDO, KATHRYN N.
VARNER and IVY SO, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

CITIGROUP GLOBAL MARKETS, INC.,
d/b/a SMITH BARNEY,

Defendant.

No. C-05-1298 PJH

**JOINT STIPULATION AND [PROPOSED]
ORDER MODIFYING CLASS
CERTIFICATION SCHEDULE**

1 **STIPULATION**

2 WHEREAS, Plaintiffs filed an Amended Complaint on November 29, 2006;

3 WHEREAS, by Order entered February 22, 2007 (Docket No. 130), the Court set
4 an amended class certification briefing schedule in which the deadline for Plaintiffs' Motion for
5 Class Certification was set for May 25, 2007;

6 WHEREAS, the production of electronic documents is still ongoing;

7 WHEREAS, given that the production of electronic documents remains ongoing
8 and due to the conflicting schedules of witnesses and counsel for the parties, some depositions
9 will not take place until June 2007;

10 WHEREAS, the parties therefore anticipate discovery for class certification
11 continuing until the end of June 2007; and

12 WHEREAS, the parties and their respective counsel therefore agree that a
13 modification of the class certification schedule is warranted and further agree that the proposed
14 modification will not unduly delay processing the action,

15 IT IS HEREBY STIPULATED, by and between the parties through their
16 respective counsel of record, that the parties propose the following revised schedule for class
17 certification:

18

19 Plaintiffs' Motion for Class Certification	July 25, 2007
20 Defendant's Opposition to Class Certification	October 3, 2007
21 Plaintiffs' Reply	November 21, 2007
22 Class Certification Hearing	December 19, 2007

23 SO STIPULATED.
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1 Dated: April 17, 2007

2 OUTTEN & GOLDEN LLP

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

NO FURTHER CONTINUANCES WILL
BE PERMITTED.

Dated: 4/18/07 _____

