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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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

Plaintiffs,

v.

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

Defendant.

Case No. C- 05-1298 PJH

**STIPULATION AND ~~PROPOSED~~
ORDER RE MODIFICATION OF CLASS
CERTIFICATION SCHEDULE AND
DEADLINE FOR COMPLETING ADR
PROCESS**

WHEREAS, by Order dated September 14, 2005, the Court entered a case management Order setting a class certification briefing schedule, as well as requiring the parties to complete an ADR process by no later than March 31, 2006;

WHEREAS, the parties have retained the services of experienced mediator Hunter R. Hughes and have engaged in two mediation sessions, with an additional session set for May 23, 2006;

WHEREAS, the parties are engaged in mediation at the same time that they are preparing for class certification;

1 WHEREAS, a modification to the schedule to move back the class certification
2 briefing and hearing dates, and the date for completion of ADR, will facilitate mediation
3 discussions;

4 WHEREAS, due to defense counsel's summer trial calendar, the parties request
5 that the schedule be modified by approximately 120 days; and

6 WHEREAS, the proposed modification of the class certification and ADR
7 schedule will not unduly delay processing the action,

8 The parties, by and through their counsel of record, stipulate and agree as follows:

9 The parties propose the following schedule for ADR and class certification:

Parties to Complete ADR Process	July 31, 2006
Plaintiffs' Motion for Class Certification:	September 29, 2006
Defendants' Opposition:	November 8, 2006
Plaintiffs' Reply:	December 8, 2006
Class Certification Hearing:	January 11, 2007 January 10, 2007

14 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

16 Respectfully submitted,

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Dated: March 17, 2006

By: /s/ Kelly M. Dermody
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Dated: March 17, 2006

By: /s/ Daniel Toal
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Attorneys for Defendant

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

3/20/06
Dated: _____

