Case 3:16-md-02741-VC Document 486 Filed 08/31/17 Page 1 of 3

1	ANDRUS WAGSTAFF, PC		
2	Aimee H. Wagstaff (SBN 278480) 7171 W. Alaska Drive		
3	Lakewood, CO 80226 Tel: (303) 376-6360		
4	Fax: (303) 376-6361 aimee.wagstaff@andruswagstaff.com		
5	Co-Lead Counsel for Plaintiffs		
6	HOLLINGSWORTH LLP		
7	Joe G. Hollingsworth (pro hac vice) Eric G. Lasker (pro hac vice)		
	Gary I. Rubin (pro hac vice)		
8	1350 I Street, N.W. Washington, DC 20005		
9	Tel: 202-898-5800 Fax: 202-682-1639		
10	Email: jhollingsworth@hollingsworthllp.com elasker@hollingsworthllp.com		
11	grubin@hollingsworthllp.com		
12	Attorneys for Defendant MONSANTO COMPANY		
13	UNITED STATES DISTRICT COURT		
14	NORTHERN DISTRICT OF CALIFORNIA		
15			
16	IN RE: ROUNDUP PRODUCTS LIABILITY LITIGATION	MDL No. 2741	
17		Case No. 3:16-md-02741-VC	
18	This document relates to:		
19	ALL ACTIONS		
20	STIPULATED REQUEST FOR ORDER C	HANGING TIME & [PROPOSED] ORDER	
21			
22			
23 24			
25			
26			
27			
28		1	
	-1-		

STIPULATED REQUEST FOR ORDER CHANGING TIME 3:16-md-02741-VC

Case 3:16-md-02741-VC Document 486 Filed 08/31/17 Page 2 of 3

1	Pursuant to Local Rule 6-2 of the Local Rules for the Northern District of California,	
2	Plaintiffs and Defendant, Monsanto Company ("Monsanto"), by and through their respective	
3	counsel of record, jointly request the Court for a one-day extension of time to submit their	
4	proposed Amended Protective and Confidentiality Order. On August 24, 2017, the Court	
5	ordered from the bench that the parties submit a proposed Amended Protective and	
6	Confidentiality Order to the Court. The Court ordered the parties to submit the proposed Order	
7	by Wednesday, August 30, 2017. As stated in the stipulation of the parties initially submitted to	
8	the Court via email by Ms. Wagstaff on agreement of the parties: "The parties have exchanged	
9	drafts of the revised language, met and conferred, and are working to streamline or eliminate the	
10	disputes on the revised language. To that end, we request an additional day to file the proposed	
11	revised Protective Order. We will detail any remaining disputes in a joint discovery letter	
12	filed tomorrow as necessary." This requested extension of time does not impact any other dates	
13	in the Court's current schedule.	
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

Case 3:16-md-02741-VC Document 486 Filed 08/31/17 Page 3 of 3

1	PURSUANT TO THE STIPULATION, IT IS SO ORDERED that:		
2	The deadline for the parties to file the proposed Amended Protective and Confidentiality		
3	Order is extended to August 31, 2017.		
4			
5			
6	Date: _August 31, 2017		
7		HONORABLE VINCE CHHABRIA United States District Judge	
8		C	
9	DATED: August 20, 2017	Dognostfully submitted	
10	DATED: August 30, 2017	Respectfully submitted,	
11		/s/ Aimee Wagstaff Aimee Wagstaff	
12		aimee.wagstaff@andruswagstaff.com Andrus Wagstaff, P.C.	
13		7171 West Alaska Drive Lakewood CO 80226	
14		Ph 303-376-6360 F 303-376-6361	
15		1 303 370 0301	
16		Co-Lead Counsel for Plaintiffs	
17			
18	DATED: August 30, 2017	Respectfully submitted,	
19		/s/Gary I. Rubin Joe G. Hollingsworth (pro hac vice)	
20		(jhollingsworth@hollingsworthllp.com)	
		Eric G. Lasker (<i>pro hac vice</i>) (elasker@hollingsworthllp.com)	
21		Gary I. Rubin (pro hac vice) (grubin@hollingsworthllp.com)	
22		HOLLINGSWORTH LLP	
23		1350 I Street, N.W. Washington, DC 20005	
24		Telephone: (202) 898-5800 Facsimile: (202) 682-1639	
25			
26		Attorneys for Defendant MONSANTO COMPANY	
27			
28			
		3	