



**MEMO ENDORSED**

March 18, 2024

**VIA ECF**

The Honorable Gary Stein  
United States Courthouse  
500 Pearl St., Room 702  
New York, NY 10007-1312  
Courtroom: 9A

Re: ***Kominis v. Starbucks Corporation***, No. 1:22-cv-06673 (JPC) (GS) – Joint  
Request to Extend Deadlines

Dear Judge Stein:

The undersigned counsel for Plaintiffs Joan Kominis and Jason McAllister (“Plaintiffs”) and Starbucks Corporation (“Defendant”) (collectively the “Parties”), respectfully request a three-month extension on case deadlines. The current applicable dates and the effect the requested modification would have on the existing schedule are stated below:

1. Close of Fact Discovery: July 1, 2024 to **October 1, 2024**
2. Deadline to Complete Depositions: April 3, 2024 to **July 3, 2024**
3. Deadline to Serve Requests for Admissions: April 30, 2024 to **July 30, 2024**
4. Close of Expert Discovery: September 30, 2024 to **January 10, 2025**
5. Deadline for Plaintiff’s Expert Disclosures: July 31, 2024 to **October 31, 2024**
6. Deadline for Defendant’s Expert Disclosures: August 31, 2024 to **December 2, 2024**
7. Motion for Class Certification: October 21, 2024 to **January 21, 2025**
8. Response to Motion for Class Certification: November 22, 2024 to **February 24, 2025**
9. Reply in Support of Motion for Class Certification: December 13, 2024 to **March 13, 2025**

The Parties have exchanged initial written discovery, are currently engaged in settlement discussions and seek this extension to further explore potential resolution.

The Parties have not previously sought extensions as to these case deadlines but have previously requested two extensions of time with respect to the previous motion to dismiss briefing (ECF Nos. 16, 25). Judge Cronan granted those requests (ECF Nos. 17, 26). Thank you for your consideration of this matter.



Respectfully submitted,

/s/ Robert Abiri

Robert Abiri (SBN 238681)  
Custodio & Dubey LLP

Email: [abiri@cd-lawyers.com](mailto:abiri@cd-lawyers.com)

445 S. Figueora St., Suite 2520

Los Angeles, CA 90071

Counsel for Plaintiffs Joan Kominis  
& Jason McAllister

/s/ Sasha Henry

Sascha Henry (SBN 191914)

Sheppard Mullin Richter & Hampton  
LLP

Email: [shenry@sheppardmullin.com](mailto:shenry@sheppardmullin.com)

30 Rockefeller Plaza

New York, NY 10112

Counsel for Defendant Starbucks  
Corporation

cc: All counsel of record via ECF

The parties' joint request for a three-month extension of existing case deadlines is granted. While the Court appreciates the reason for the request is ongoing settlement discussions, any further extensions of time are unlikely to be granted. The parties are directed to submit a Proposed First Amended Case Management Plan and Scheduling Order with the revised deadlines for the undersigned's approval.

**SO ORDERED:**

A handwritten signature in black ink, appearing to read 'Gary Stein', written over a horizontal line.

**HON. GARY STEIN**  
UNITED STATES MAGISTRATE JUDGE

Dated: March 25, 2024  
New York, New York