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 R&D MEDIA NORTH AMERICAS B.V.
 10 d/b/a GLOMOBI

11 UNITED STATES DISTRICT COURT

12 EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

13 WILLIAM PFROMMER and MICHAEL
 WATSON, individually and on behalf of a
 14 class of similarly situated individuals

15 Plaintiffs,

16 v.

17 R&D MEDIA NORTH AMERICAS B.V.
 D/B/A GLOMOBI, a Dutch company,
 18 MBLOX, INC., a Delaware corporation,

19 Defendants.

Action No. 1:09-cv-01442-LJO-GSA
 [Stanislaus County Superior Court Action
 No. 636593]

**STIPULATION TO CONTINUE
 HEARING ON PLAINTIFFS' MOTION
 TO REMAND; ORDER**

Date: February 26, 2010
 Time: 9:30 a.m.
 Judge: Magistrate Judge Gary S. Austin

Complaint Filed: January 15, 2009
 Trial Date: None Set

21 Plaintiffs WILLIAM PFROMMER and MICHAEL WATSON (collectively "Plaintiffs")
 22 and Defendants MBLOX, INC. ("Defendant" or "mBlox") and R&D MEDIA NORTH
 23 AMERICA B.V. d/b/a GLOMOBI ("Defendant" or "R&D") hereby stipulate and respectfully
 24 request that the Court continue the hearing for Plaintiffs' Motion to Remand presently set for
 25 hearing before Magistrate Judge Gary S. Austin on February 26, 2010. In support of this
 26 Stipulation, the Parties state as follows:

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1 1. Plaintiffs originally filed this action in the Stanislaus County Superior Court on
2 January 15, 2009. Plaintiffs filed a First Amended Complaint on June 8, 2009.

3 2. This action was removed from Stanislaus County Superior Court to this court by
4 Defendant R&D MEDIA NORTH AMERICA B.V. d/b/a GLOMOBI on August 17, 2009.

5 3. Plaintiffs filed a Motion to Remand on October 16, 2009. At the time this motion
6 was filed, the Initial Case Management Conference was set for February 18, 2010.

7 4. The Parties herein originally sought and obtained continuances of the both the
8 Motion to Remand and the Initial Case Management Conference because counsel for R&D was
9 engaged in trial between October 29, 2009 and December 8, 2009.

10 5. Since the aforementioned trial has been completed, settlement negotiations in this
11 matter have gained momentum and these good-faith discussions are ongoing. Accordingly, the
12 Parties respectfully submit that good cause exists to continue the hearing date on the Motion to
13 Remand to allow the Parties to focus on these negotiations. This continuance will also conserve
14 judicial resources and promote the interests of judicial economy.

15 **NOW, THEREFORE**, the Parties hereby stipulate and agree that, with the Court's
16 approval:

- 17 1. The hearing on Plaintiff's Motion to Remand is continued from
18 February 26, 2010 to March 26, 2010, at 9:30 a.m., before Magistrate
19 Judge Gary S. Austin, and
20 2. All other deadlines related to the hearings are continued accordingly.

21 Dated: January 4, 2010

KAMBEREDELSON, LLC

22 By: /s/ Myles McGuire as authorized 1/4/10

23 Alan Himmelfarb

24 Myles McGuire

25 Attorney for Plaintiffs William Pfrommer
and Michael Watson

26 Dated: January 4, 2010

WILDMAN HARROLD ALLEN & DIXON, LLP

27 By: /s/ Chung-Han Lee as authorized 1/4/10

28 Chung-Han Lee

Attorney for Defendant mBlox, Inc.

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Dated: January 4, 2010

BURNHAM BROWN
By: /s/ Kevin Larson 1/4/10
Kevin Larson
Attorney for Defendant R&D Media
North America B.V.

ORDER

Pursuant to the stipulation of the parties, the request is hereby granted.

IT IS SO ORDERED.

Dated: January 4, 2010

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE