

1 MICHAEL MALK, ESQ., APC
2 Michael Malk, Esq., (State Bar No. 222366)
3 1180 South Beverly Drive, Suite 302
4 Los Angeles, California 90035
5 Telephone: (310) 203-0016
6 Facsimile: (310) 499-5210
7 mm@malklawfirm.com

8 Attorneys for Plaintiff Adam Goodwin

9 Mark J. Jacobs, Bar No. 208945
10 Shaun J. Voigt, Bar No. 265721
11 Laurie A. Koscielak, Bar No. 299106
12 FISHER & PHILLIPS LLP
13 2050 Main Street, Suite 1000
14 Irvine, California 92614
15 Telephone (949) 851-2424
16 Facsimile (949) 851-0152

17 Attorneys for Defendant
18 Winn Management Group, LLC

19 UNITED STATES DISCRICT COURT
20 EASTERN DISTRICT OF CALIFORNIA
21 (UNLIMITED JURISDICTION)

22 ADAM GOODWIN, individually and
23 individually on behalf of all others
24 similarly situated,

25 Plaintiffs,

26 v.

27 WINN MANAGEMENT GROUP
28 LLC, a Massachusetts Limited
Liability Company, and Does 1
through 100, inclusive

Defendants.

Case No. 1:15-cv-00606-WBS-GSA

**STIPULATION TO CONTINUE
PRETRIAL SCHEDULING
CONFERENCE; [PROPOSED]
ORDER**

1 Plaintiff Adam Goodwin (“Plaintiff”) and Defendant Winn Management
2 Group, LLC (“Defendant”), by and through their counsel of record, hereby
3 stipulate and agree as follows:
4

5 WHEREAS, this Court set a Status (Pretrial Scheduling) Conference
6 to take place on August 31, 2015 at 2:00 PM;
7

8 WHEREAS, Plaintiff’s counsel was previously ordered to appear for
9 an Initial Status Conference before the Hon. Virginia A. Phillips, Judge of the
10 Central District of California, on August 31, 2015 at 1:30 PM in Riverside
11 California;
12

13 WHEREAS, Plaintiff’s counsel met and conferred with Defendant’s
14 counsel regarding this issue, and Defendant’s counsel graciously agreed to jointly
15 seek continuance of the Status (Pretrial Scheduling) Conference.
16
17

18 THEREFORE, subject to the approval of this Court, it is hereby stipulated
19 and agreed, by and between the parties hereto, by and through their respective
20 counsel, that the Status (Pretrial Scheduling) Conference, currently scheduled for
21 August 31, 2015, shall be continued to a date after September 2, 2015. Plaintiff’s
22 counsel’s office will be closed on the following dates for Jewish holidays
23 September 14-15, 22-23, 28-30, and October 1-6, and respectfully requests that the
24 Conference not be continued to one of those dates.
25
26
27

28 IT IS SO STIPULATED

1 RESPECTFULLY SUBMITTED,
2

3 Dated: July 23, 2015
4

5 /s/ Michael Malk
6 Michael Malk
7 MICHAEL MALK, ESQ., APC
8 Attorneys for Plaintiffs

9 Dated: July 23, 2015

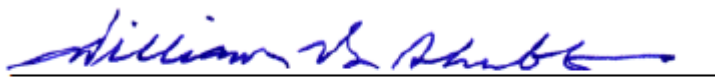
10 /s/ Shaun J. Voigt (as authorized on 7/23/15)
11 Mark J. Jacobs
12 Shaun J. Voigt
13 Laurie A. Koscielak
14 FISHER & PHILLIPS, LLP
15 Attorneys for Defendant

16 **ORDER**

17 Pursuant to the stipulation of the Parties, and **GOOD CAUSE**
18 **APPEARING THEREFOR**, the Court hereby **ORDERS** that the Status (Pretrial
19 Scheduling) Conference in this matter shall be continued to **November 9, 2015 at**
20 **2:00 p.m.** A Joint Status Report shall be filed no later than **October 26, 2015.**

21 **IT IS SO ORDERED.**

22 Dated: July 24, 2015

23 
24 WILLIAM B. SHUBB
25 UNITED STATES DISTRICT JUDGE