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21 MEYER MANUFACTURING COMPANY LIMITED

22 UNITED STATES DISTRICT COURT

23 EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO DIVISION

24 MEYER MANUFACTURING  
COMPANY LIMITED, a Hong Kong  
25 Corporation,

26 Plaintiff,

27 v.

CASE NO. 2:11-cv-03153 LKK-DAD

**STIPULATION AND ORDER REQUESTING THE  
COURT TO POSTPONE STATUS REPORT  
DEADLINE, INITIAL STATUS CONFERENCE,  
AND RELATED DATES, UNTIL AFTER  
DEFENDANT FILES ITS ANSWER**

28 Stipulation Postponing Case  
Management Conference

1 TELEBRANDS CORP., a New Jersey  
2 Corporation,  
3 Defendant.

4 Plaintiff MEYER MANUFACTURING COMPANY LIMITED and Defendant  
5 TELEBRANDS CORP., by their counsel, hereby stipulate, agree, and request, subject to approval  
6 by the Court, to postpone the parties' deadline for submitting their Status Report, currently set for  
7 April 16, 2012, as well as the Status Conference, currently set for April 30, 2012, at 2:00 p.m.,  
8 until May 29, 2012, at 2:00 p.m., pursuant to the proposed Order form below.

9 On April 9, 2012, the Court denied Defendant's Motion to Transfer this action to the  
10 United States District Court for New Jersey as well as Defendant's Motion to Extend the Time to  
11 Answer the Complaint. The Court ordered Defendant to file its Answer by April 16, 2012.  
12 Immediately prior to the Court's ruling, the parties had agreed to, and were in the process of  
13 finalizing a stipulation to postpone the initial Status Conference and related deadlines until after  
14 the Court ruled and after Defendant filed its Answer.

15 As currently scheduled, the parties' Status Report is due on April 16, 2012, the same day  
16 as Defendant's Answer is now due. But Defendant's Answer and any counterclaims will  
17 undoubtedly affect case management, as well as the scope of the parties' conference pursuant to  
18 Federal Rule of Civil Procedure 26(f). Therefore, without prejudice to either party, the parties  
19 jointly request that this Court postpone the April 16, 2012 Status Report deadline, along with the  
20 April 30, 2012 Case Management Conference, and other deadlines and obligations relating  
21 thereto, including the time for the parties to exchange initial disclosures pursuant to Federal Rule  
22 of Civil Procedure 26(a), in order to allow the parties time to evaluate Defendant's Answer, and to  
23 hold a meaningful Rule 26(f) conference thereafter, prior to submitting their Status Report and  
24 serving initial disclosures.

25 WHEREFORE, in the interests of justice and efficiency, the parties jointly request that the  
26 Court approve the [Proposed] Order below.  
27  
28

1  
2  
3 **Dated: April 10, 2012**

HOLLAND & KNIGHT LLP

4 By: /s/ Michael A. Grill

5 R. DAVID DONOGHUE  
6 MICHAEL A. GRILL  
7 Attorneys for Plaintiff  
8 MEYER MANUFACTURING COMPANY  
9 LIMITED

10 **Dated: April 10, 2012**

COOPER & DUNHAM LLP

11 ROPERS, MAJESKI, KOHN & BENTLEY

12 By: /s/ Neil A. Smith

13 NEIL A. SMITH  
14 Attorneys for Defendant  
15 TELEBRANDS CORP.


16 **ORDER POSTPONING CASE MANAGEMENT**

17 Plaintiff and Defendant having jointly requested that the Court postpone the Initial  
18 Scheduling Conference, and the dates and meetings relating thereto, to allow sufficient time for  
19 the parties to meet and confer and to submit their initial status report following Defendant's filing  
20 of its Answer, which must be filed on April 16, 2012,

21 IT IS HEREBY ORDERED that the Initial Scheduling Conference in this action shall be  
22 scheduled on May 29, 2012, at 2:00 p.m.

23 Dates for meeting of counsel, initial disclosures, and the filing of Case Management/  
24 Status Reports, shall be proportionately moved back the same number of days as the Initial  
25 Scheduling Conference, as set by the Court.

26 **Dated: April 11, 2012**

27   
28 LAWRENCE K. KARLTON  
SENIOR JUDGE  
UNITED STATES DISTRICT COURT