

1 **MAJORS & FOX LLP**  
 Frank J. Fox SBN139147(Ca.)  
 2 Lawrence J. Salisbury SBN179748(Ca.)  
 Andrew M. Greene SBN167386(Ca.)  
 3 Jonathan L. Gerber SBN251219(Ca.)  
 401 West "A" Street, Suite 2350  
 4 San Diego, California 92101-7921  
 Telephone: (619) 234-1000  
 5 Facsimile: (619) 234-1011  
 Emails: fjfox@majorfox.com; lsalisbu@majorfox.com;  
 6 agreene@majorfox.com; jgerber@majorfox.com

7 **ATTORNEYS AGAINST ABUSE OF ELDERS**  
 Mark A. Redmond SBN161520(Ca.)  
 8 1819 K Street, Suite 200  
 Sacramento, California 95811-4183  
 9 Telephone: (916) 444-8240  
 Facsimile: (916) 438-1820  
 10 Email: mr@justice4elders.com

Attorneys for Plaintiff, Anatoli Romanov, and all others similarly situated

11  
 12 UNITED STATES DISTRICT COURT  
 13 FOR THE EASTERN DISTRICT OF CALIFORNIA  
 14 SACRAMENTO DIVISION

15 ANATOLI ROMANOV, an individual, on  
behalf of himself and all others similarly  
16 situated,

17 Plaintiff,

18 v.

19 WESTWARD HOSPITALITY  
 MANAGEMENT LLC, a Delaware  
 20 corporation; WESTMONT HOSPITALITY  
 GROUP, INC., a Texas corporation; and  
 21 DOES 1 through 100, inclusive,

22 Defendants.

Case No. 2:12-cv-02036-GEB-CKD

[PROPOSED] STIPULATED ORDER  
REQUESTING COURT CONTINUE ALL  
DATES BY AT LEAST (90) NINETY DAYS  
AND STAYING RELEVANT PROCEEDINGS

Courtroom: 10  
Judge: Hon. Garland E. Burrell, Jr.

Date Filed: June 22, 2012

23  
 24 This Stipulation is entered into by and between Plaintiff Anatoli Romanov  
 25 ("Plaintiff") and Defendants Westward Hospitality Management LLC and Westmont  
 26 Hospitality Group, Inc. ("Defendants") (collectively herein "Plaintiff" and "Defendants" are  
 27 referred to as the "Parties"). The Parties respectfully submit this Stipulation and  
 28 respectfully request the Court extend all dates by at least (90) ninety days and to stay

1 relevant proceedings to allow the Parties to attempt to resolve the litigation through private  
2 mediation.

3 WHEREAS, Plaintiff filed his complaint on or around June 22, 2012, in California  
4 state superior court (the "Action") and shortly thereafter drafted his first set of written  
5 discovery in the Action tailored for the state court in which the Action was pending;

6 WHEREAS, Defendants removed the Action to federal court on or around August  
7 12, 2012, prior to Plaintiff having the opportunity to actually serve the discovery;

8 WHEREAS, shortly after removal, on or around December 19, 2012, Plaintiff  
9 served his edited first set of written discovery tailored for the federal court in which the  
10 Action is now pending (the "Discovery"). Plaintiff also drafted and served deposition  
11 notices for Defendants on or around January 14, 2013;

12 WHEREAS, Plaintiff granted Defendants at least two extensions of time in which to  
13 respond to the Discovery and received Defendants' original responses and objections to  
14 the Discovery on or around February 11, 2013;

15 WHEREAS, shortly thereafter, on or around February 20, 2013, Plaintiff sent a  
16 meet and confer correspondence to Defendants which requested supplemental responses  
17 be provided to the Discovery on or before February 26, 2013;

18 WHEREAS, the Parties agreed to extend Defendants' deadline to respond to the  
19 meet and confer correspondence on several occasions to allow the Parties to discuss  
20 each's amenability to private mediation (the most recent extension is set to expire on  
21 March 20, 2013);

22 WHEREAS, the Parties have agreed to stay further meeting and conferring and  
23 motion work, if necessary, related to the Discovery to allow the Parties to participate in  
24 private mediation without incurring further costs prior to the completion of that mediation;

25 WHEREAS, the following dates are currently calendered in this matter which must  
26 be continued and/or stayed to allow the Parties to attempt private mediation:

- 27 ● Certification Motion (file and serve): May 6, 2013; and
- 28 ● Status Conference: July 15, 2013; 9:00 a.m.

1 WHEREAS, the Parties have agreed to attempt to resolve the Action through  
2 private mediation if the Court approves at least a ninety (90) day extension of these dates  
3 and/or staying relevant proceedings currently pending in the Action;

4 NOW, THEREFORE, the Parties stipulate and agree as follows:

5 1) The deadlines set forth in the Court's Order dated November 14, 2012, for  
6 moving for class certification and setting the Status (Pretrial Scheduling) Conference be  
7 rescheduled as follows:

- 8 • Certification Motion (file and serve): August 6, 2013; and
- 9 • Status Conference: October 28, 2013; 9:00 a.m. A joint status report shall  
10 be filed fourteen days prior to the hearing.

11 2) The Court stays all relevant aspects of this litigation, including all discovery,  
12 to allow the Parties to mediate this case.

13 IT IS SO STIPULATED.

14  
15 DATED: \_\_\_\_\_

MAJORS & FOX LLP

16  
17 By: \_\_\_\_\_  
Jonathan L. Gerber  
18 Attorneys for Plaintiff, Anatoli Romanov, and all  
others similarly situated

19  
20 DATED: \_\_\_\_\_

ATTORNEYS AGAINST ABUSE OF ELDERS

21  
22 By: \_\_\_\_\_  
Mark A. Redmond  
23 Attorneys for Plaintiff, Anatoli Romanov, and all  
others similarly situated

24  
25 DATED: \_\_\_\_\_

JEFFER MANGELS BUTLER & MITCHELL LLP

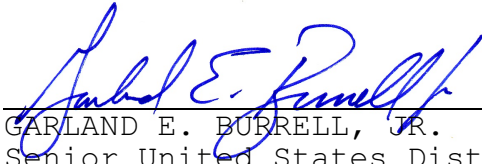
26  
27 By: \_\_\_\_\_  
Travis M. Gemoets  
Patricia M. DeSantis  
28 Attorneys for Defendants Westward Hospitality

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Management LLC and Westmont Hospitality  
Group, Inc.

PURSUANT TO STIPULATION OF THE PARTIES, IT IS SO ORDERED.

Dated: March 19, 2013

  
\_\_\_\_\_  
GARLAND E. BURRELL, JR.  
Senior United States District Judge