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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

RAMSES GUTIERREZ, et. al. individually,
and on behalf of all others similarly situated,

Plaintiff,

v.

CARTER BROTHERS SECURITY
SERVICES, LLC., AT&T DIGITAL LIFE,
INC.; and DOES 1 through 10, inclusive,

Defendants.

CASE NO. 14-CV-00351-MCE-CKD

**JOINT STIPULATION AND ORDER TO
AMEND SCHEDULING ORDER**

ACTION FILED: March 10, 2014
JUDGE: Hon. Morrison C. England

1 STIPULATION

2 Plaintiffs and Defendant AT&T Digital Life, Inc. (“AT&T”) (collectively with Plaintiffs, the
3 “Parties”), by and through their respective counsel of record, hereby stipulate as follows:

4 WHEREAS, on April 13, 2017, this Court entered an Initial Pretrial Scheduling Order
5 (“Scheduling Order”) (Dkt. 82);

6 WHEREAS, according to the terms of the Scheduling Order, the Parties must meet and confer
7 as required by Federal Rule of Civil Procedure 26(f) regarding their discovery plan by June 12, 2017
8 (Dkt. 82);

9 WHEREAS, the Parties must serve their initial disclosures at or within 14 days after their
10 Rule 26(f) conference as required by Federal Rule of Civil Procedure 26(a)(1)(C);

11 WHEREAS, on May 2, 2017, Gordon & Rees Scully Mansukhani (“Gordon & Rees”),
12 counsel for Defendant Carter Brothers Security Services, LLC (“Carter Brothers”) filed a Motion for
13 Withdrawal of Counsel (Dkt. 88), which is pending;

14 WHEREAS, good cause exists to grant relief from the deadlines imposed by the Scheduling
15 Order because the Parties are currently unable to meet and confer with Carter Brothers regarding
16 discovery issues;

17 WHEREAS, extending the time to provide initial disclosures and meet and confer regarding
18 the Parties’ discovery plan pending the resolution of Gordon & Rees’ Motion to Withdraw as
19 Counsel and potential new representation of Carter Brothers will conserve the resources of the Court
20 and avoid prejudice to the Parties.

21 NOW THEREFORE, the Parties hereby stipulate, subject to the approval of this Court, that:

- 22 1. The Scheduling Order should be amended to vacate the Parties’ deadline to meet and
23 confer regarding initial disclosures pursuant to Rule 26(f) and all related deadlines; and
24 2. The Court should issue a new Scheduling Order following the resolution of Gordon &
25 Rees’ Motion to Withdraw as Counsel and/or the filing of a notice of appearance of new counsel for
26 Carter Brothers.

27 **IT IS SO STIPULATED.**

28

1 Dated: June 5, 2017

GIBSON, DUNN & CRUTCHER LLP

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3 By: /s/ Katherine V.A. Smith
Katherine V.A. Smith

4 Attorneys for Defendant AT&T Digital Life, Inc.

5 Dated: June 5, 2017

ROSE LAW, A PROF. CORP.

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7 By: /s/ Joseph W. Rose
Joseph W. Rose

8 Attorneys for Plaintiff
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2 ORDER

3 Pursuant to this Stipulation and for the reasons stated therein, IT IS HEREBY ORDERED
4 that:

- 5 1. The Scheduling Order is amended to vacate the Parties' deadline to meet and confer
6 regarding initial disclosures pursuant to Rule 26(f) and all related deadlines; and
7 2. Not later than ten (10) days following the date an order is electronically filed resolving
8 Gordon & Rees' Motion to Withdraw as Counsel, the parties are directed to file a joint status report
9 regarding the issuance of an Amended Scheduling Order.

10 IT IS SO ORDERED.

11 Dated: June 16, 2017

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13 MORRISON C. ENGLAND, JR.
14 UNITED STATES DISTRICT JUDGE
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