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Attorneys for Defendant
SHRED-IT USA INC. n/k/a SHRED-IT USA LLC

17 UNITED STATES DISTRICT COURT
18 EASTERN DISTRICT OF CALIFORNIA

19
20 MICHAEL KIRCHNER, an individual, on behalf
of himself and all others similarly situated,,

21 Plaintiff,

22 v.

23 SHRED-IT USA INC., a Delaware Coporation,
24 FIRST ADVANTAGE LNS SCREENING
SOLUTIONS, INC., and DOES 1 through 10, ,

25 Defendants.
26

Case No. 2:14-cv-01437-WBS-EFB

**STIPULATION OF ALL PARTIES TO
CONTINUE STATUS (PRETRIAL
SCHEDULING) CONFERENCE AND
STAY DISCOVERY PENDING RULING
ON DEFENDANTS' RESPECTIVE
MOTIONS TO DISMISS; [PROPOSED]
ORDER**

1 Plaintiff MICHAEL KIRCHNER and Defendants FIRST ADVANTAGE LNS SCREENING
2 SOLUTIONS, INC. ("First Advantage"), and SHRED-IT USA INC. ("Shred-It") (collectively,
3 "Defendants"), by their counsel and pursuant to Eastern District Local Rule 144(a), stipulate and agree
4 as follows:

5 1. First Advantage and Shred-It, if it so chooses, will file their Motions to Dismiss
6 Plaintiff's First Amended Class Action Complaint on or before October 6, 2014, noticed for hearing on
7 November 17, 2014.

8 2. The parties will hold a Rule 26(f) conference on Tuesday, September 23, 2014.

9 3. The parties may serve discovery following the Rule 26(f) conference; however,
10 responses and/or objections shall not be due until thirty (30) days following the Court's ruling(s) on the
11 Motion(s) to Dismiss Plaintiff's First Amended Class Action Complaint.

12 4. The Status (Pretrial Scheduling) Conference will be continued to the date twenty-
13 one (21) days after the Court's ruling(s) on the Motion(s) to Dismiss Plaintiff's First Amended Class
14 Action Complaint. Pursuant to Local Rule 240, the parties will submit to the Court a JOINT Status
15 Report fourteen (14) days prior to the hearing date for the Status (Pretrial Scheduling) Conference.

16 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

17 DATED: September 23, 2014

Respectfully submitted,

18 SEYFARTH SHAW LLP

19 By: /s/ Mark P. Grajski

20 Mark P. Grajski

21 Attorneys for Defendant
22 FIRST ADVANTAGE LNS SCREENING
SOLUTIONS, INC.

23 DATED: September 23, 2014

THE DION-KINDEM LAW FIRM

24 By: /s/ Peter R. Dion-Kindem

25 Peter R. Dion-Kindem

26 Attorneys for Plaintiff
27 MICHAEL KIRCHNER

1 DATED: September 23, 2014

QUINN EMANUEL URQUHART
& SULLIVAN LLC

2
3 By: /s/ Shon Morgan
Shon Morgan

4 Attorneys for Defendant
5 SHRED-IT USA INC. n/k/a SHRED-IT USA LLC

6 **ORDER**

7
8 **IT IS SO ORDERED.** The Status (Pretrial Scheduling) Conference is continued to **January 5,**
9 **2015 at 2:00 p.m.** A Joint Status Report shall be filed no later than December 22, 2014.

10 Dated: September 24, 2014

11 

12 WILLIAM B. SHUBB
13 UNITED STATES DISTRICT JUDGE