

1 C. Brandon Wisoff (State Bar No. 121930)
2 bwisoff@fbm.com
3 Alexander M. Porcaro (State Bar No. 281185)
4 aporcaro@fbm.com
5 Farella Braun + Martel LLP
6 235 Montgomery Street, 17th Floor
7 San Francisco, CA 94104
8 Telephone: (415) 954-4400
9 Facsimile: (415) 954-4480

10 Attorneys for Defendant
11 DELL FINANCIAL SERVICES, LLC

12 UNITED STATES DISTRICT COURT OF CALIFORNIA
13 EASTERN DISTRICT

14 FLOSERFIDA GARFIL,

15 Plaintiff,

16 v.

17 DELL FINANCIAL SERVICES, LLC,
18 foreign limited liability company; and DOES
19 1 to 10, inclusive,

20 Defendants.

Case No. 14-cv-01729-GEB-AC

**JOINT REQUEST AND [PROPOSED]
ORDER TO CONTINUE INITIAL
SCHEDULING CONFERENCE
(L.R. 144, 240)**

Complaint filed: July 22, 2014
Current response date: December 31, 2014

21 Plaintiff FLOSERFIDA GARFIL (“Plaintiff”) and Defendant DELL FINANCIAL
22 SERVICES, LLC (“Defendant”), by and through their respective counsel, hereby agree as
23 follows:

24 WHEREAS, pursuant to Court order dated July 23, 2014, an Initial Scheduling
25 Conference was initially scheduled for October 27, 2014 at 9:00 a.m., with the parties to file a
26 Rule 26(f) Joint Status Report by October 13, 2014;

27 WHEREAS, pursuant to joint request and Court minute order dated October 16, 2014,
28 the Initial Scheduling Conference was continued to December 15, 2014 at 9:00 a.m., with the
parties to file a Rule 26(f) Joint Status Report by December 1, 2014;

1 WHEREAS, pursuant to stipulation and Court order entered on October 31, 2014, the
2 time for Defendant's response to Plaintiff's complaint was extended to December 31, 2014;

3 WHEREAS, Defendant has not yet responded to Plaintiff's complaint or generally
4 appeared in this action;

5 WHEREAS, the parties are engaged in ongoing settlement discussions and wish to
6 continue those discussions before they prepare a Rule 26(f) Joint Status Report;

7 WHEREAS, the parties also are discussing amending the pleadings and possible
8 arbitration if this matter should not settle;

9 WHEREAS, Defendant's counsel Alexander M. Porcaro will be traveling outside the
10 United States from November 19, 2014 through December 7, 2014; and

11 WHEREAS both parties agree that good cause exists to continue the Initial Scheduling
12 Conference to a convenient date after January 14, 2014;

13 NOW, THEREFORE, THE PARTIES HEREBY AGREE AND JOINTLY REQUEST
14 THAT the Court continue the Initial Scheduling Conference to a convenient date after January
15 14, 2014.

16 RESPECTFULLY SUBMITTED,

17
18 Dated: November 14, 2014

FARELLA BRAUN + MARTEL LLP

19 By: /s/ Alexander M. Porcaro
Alexander M. Porcaro

20 Attorneys for Defendant
21 DELL FINANCIAL SERVICES, LLC

22
23 Dated: November 14, 2014

PRICE LAW GROUP, APC

24 By: /s/ Stuart M. Price (as authorized on Nov. 14, 2014)
Stuart M. Price

25 Attorneys for Plaintiff
26 FLOSERFIDA GARFIL

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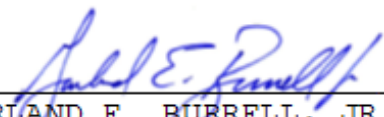
[PROPOSED] ORDER

Based upon the joint request of Plaintiff FLOSERFIDA GARFIL and Defendant DELL FINANCIAL SERVICES, LLC, and for good cause shown, IT IS ORDERED THAT:

1. The Initial Scheduling Conference has been reset to January 26, 2015, at 9:00 a.m.
2. The parties shall file a Joint Status Report not later than fourteen (14) days prior to the Initial Scheduling Conference.

IT IS SO ORDERED.

Dated: December 2, 2014



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