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10 Attorneys for Plaintiffs
11 ROBERT LEVINE and VERONICA GUZMAN

12 * *Defendants' counsel listed after the caption.*

13 UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF CALIFORNIA

15 ROBERT LEVINE and VERONICA
16 GUZMAN,

17 Plaintiffs,

18 v.

19 THE SLEEP TRAIN, INC.; LIVE NATION
20 ENTERTAINMENT, INC.; COASTAL
21 BREEZE LIMOUSINE, LLC; BGE YUBA,
22 LLC; and DOES 1-20, Inclusive,

23 Defendants.

24 CASE NO. CV 15-00002 WBS
25 **Civil Rights**

26 **STIPULATION AND [PROPOSED] ORDER**
27 **TO CONTINUE STATUS CONFERENCE**
28 **DATE**

29 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

30 A Limited Liability Partnership
31 Including Professional Corporations

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Attorneys for Defendants

LIVE NATION ENTERTAINMENT, INC.
and THE SLEEP TRAIN, INC.

1 **TO THE CLERK OF THE ABOVE-ENTITLED COURT AND TO ALL PARTIES AND TO**
2 **THEIR RESPECTIVE ATTORNEYS OF RECORD:**

3 **STIPULATION**

4 Plaintiffs Robert Levine and Veronica Guzman (“Plaintiffs”) through their counsel of record
5 make this unopposed request that the Court continue the Status Conference from April 27, 2015, to
6 May 11, 2015, or a date thereafter that is agreeable to the Court. This request is based on the
7 following good cause:

- 8 1. Plaintiffs’ counsel is scheduled to take a deposition in another matter on April 27, 2015, that
9 was scheduled before the Court set this Status Conference.
- 10 2. It would be difficult to reschedule the deposition because of the deadlines in the other case
11 and because of the number of attorneys and others involved.
- 12 3. A delay in the Status Conference in this case will allow the parties to make progress on
13 discovery and planning, which will make them more prepared to discuss the case in detail.
- 14 4. All parties are available for a Status Conference on May 11, 2015.
- 15 5. Defendants Live Nation Entertainment, Inc. and The Sleep Train, Inc. (“Defendants”) do not
16 oppose this request.

17 Therefore, Plaintiffs hereby make this unopposed request, through their counsel, that this
18 Court continue the date of the Status Conference from April 27, 2015, to May 11, 2015, or a date
19 thereafter agreeable to the Court and the Joint Status Conference Statement shall be due two weeks
20 prior to the conference.

21
22
23 Date: April 13, 2015

LAW OFFICE OF PAUL L. REIN

24
25 By: /s/ Celia McGuinness
26 CELIA McGUINNESS, ESQ.
Attorneys for Plaintiffs
ROBERT LEVINE and VERONICA GUZMAN

27 //
28

1 Date: April 13, 2015

SHEPPARD, MULLIN, RICHTER & HAMPTON
LLP

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By: /s/ Bradley J. Leimkuhler
BRADLEY J. LEIMKUHNER, ESQ.
Attorneys for Defendants
LIVE NATION ENTERTAINMENT, INC.
and THE SLEEP TRAIN, INC.

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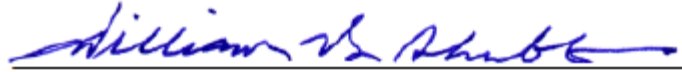
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ORDER

Pursuant to stipulation, and for good cause shown, IT IS SO ORDERED.

The Case Management Conference in the above captioned case is hereby moved from April 27, 2015, to **May 11, 2015 at 2:00 p.m.** A Joint Case Management Conference statement shall be due two weeks prior to the conference on **April 27, 2015**

Dated: April 14, 2015



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE