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Attorneys for Defendant
GREENBERG TRAUIG, LLP

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

GARRY SAPERSTEIN,

Plaintiff,

v.

GREENBERG TRAUIG, LLP, and DOES 1
through 100, inclusive,

Defendants.

Case No.: 2:16-cv-00271-JAM-EFB

Hon. John A. Mendez

**JOINT STIPULATION AND ORDER TO
CONTINUE JOINT STATUS REPORT,
RULE 26(f) DISCOVERY PLAN, AND
RELATED DEADLINES**

1 **JOINT STIPULATION**

2 **TO THE HONORABLE COURT:** This Stipulation to continue, by three weeks, the
3 deadline to file a joint status report, Rule 26(f) discovery plan, and to confer as required by Fed.
4 R. Civ. P. 26(f) is made by and between Plaintiff Gary Saperstein and Defendant Greenberg
5 Traurig, LLP (“Defendant”), with respect to the following facts:
6

7 1. On February 11, 2016, Defendant removed this case from El Dorado Superior
8 Court to this Court.
9

10 2. On February 11, 2016, the Court entered an Order Requiring Joint Status Report
11 requiring that, “[w]ithin sixty (60) days of ... the date of removal, the parties shall confer as
12 required by Fed. R. Civ. P. 26(f) and shall prepare and submit to the Court a joint status report
13 that includes the Rule 26(f) discovery plan.” Dkt. No., ¶4.
14

15 3. Sixty days from the date of the removal is April 11, 2016.

16 4. Defendant is currently in the process of transferring this file from counsel of
17 record, Steptoe & Johnson LLP (“Steptoe”), to new counsel, Jenner & Block LLP (“Jenner”).
18

19 5. Counsel of record Michael McNamara and Kirsten Spira are similarly in the
20 process of transitioning from Steptoe to Jenner, and expect that process to be completed by mid-
21 April 2016.

22 6. Counsel for Plaintiff and Defendant met and conferred on March 16, 2016 and
23 agreed that for the convenience of the parties and their counsel of record and to maximize the
24 efficiency of this case in light of the transition to new counsel, the deadlines set forth in the
25 Court’s Order Requiring Joint Status Report should be continued three weeks to allow for the
26 transition to new counsel to be completed.
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IT IS SO ORDERED.

Dated: 3/21/2016

/s/ John A. Mendez
HON. JOHN A. MENDEZ

UNITED STATES DISTRICT JUDGE