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6 Attorneys for BAY TRAILER SALES, LLC and  
7 JONATHAN EMDE

8 UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

10  
11 GOLDEN STATE TRUCK SALES, INC., a  
California corporation; DHARMINDER  
12 SINGH, an individual,

13 Plaintiffs,

14 vs.

15 BAY TRAILER SALES, LLC, a Virginia  
limited liability company; JONATHAN  
16 EMDE, an individual; and DOES 1-25,  
inclusive,

17 Defendants.  
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CASE NO. 2:16-cv-00580-MCE-KJN

**STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE SETTLEMENT  
CONFERENCE**

Judge: Hon. Edmund Brennan

Date: May 4, 2017

Time: 10:00 a.m.

Crtrm.: 8, 13th Floor

Trial Date: March 5, 2018

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20 Plaintiffs Golden State Truck Sales, Inc. and Dharminder Singh (“Plaintiffs”), and  
21 Defendants Bay Trailer Sales, LLC and Jonathan Emde (“Defendants”), having met and conferred,  
22 hereby jointly request, based on the showing of good cause discussed herein, that the Further  
23 Settlement Conference which is presently set for May 4, 2017 be rescheduled to July 27, 2017 at  
24 10:00 am or a date more suitable to the Court.

25 I. GOOD CAUSE EXISTS TO CONTINUE THE SETTLEMENT CONFERENCE

26 On February 23, 2017, the Parties, via counsel, engaged in a Settlement Conference before  
27 Judge Brennan. At that Conference, the Parties agreed to cooperate to accomplish the sale of



1 certain assets, the successful disposal of which will enable the parties to have more productive  
2 settlement communications in the near future. To that end, Judge Brennan consented to  
3 continuing the Settlement Conference to May 4, 2017.

4 Since the initial Settlement Conference, the Parties have made progress in the sale of those  
5 certain assets. Nevertheless, more time is necessary to complete those efforts and both parties have  
6 agreed that a Settlement Conference at this juncture would not be productive for either side.

7 The Parties and their counsel therefore believe and submit that good cause exists for a  
8 further continuance of the Settlement Conference. This continuance will allow both parties to  
9 focus their efforts toward settlement of the matter. Accordingly, Plaintiffs and Defendants jointly  
10 request the Court continue the Settlement Conference which is presently set for May 4, 2017, and  
11 reschedule the Settlement Conference to July 27, 2017. This continuance will not disrupt Trial in  
12 this matter, which is presently set for March 5, 2018.

13 II. CONCLUSION

14 For the foregoing reasons, the Parties jointly request that the Further Settlement  
15 Conference which is presently set for May 4, 2017 be rescheduled to July 27, 2017 at 10:00 am or  
16 a date more suitable to the Court.

17 Respectfully submitted,

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19 DATED: May 1, 2017

LEWIS BRISBOIS BISGAARD & SMITH LLP

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By:                     /s/ Maren MacAdam                      
John S. Poulos  
Maren MacAdam  
Attorneys for BAY TRAILER SALES, LLC and  
JONATHAN EMDE

