

1 Dennis J. Hayes, Esq. (SBN 123576)
 Tracy J. Jones, Esq. (SBN 263632)
 2 **HAYES & ORTEGA, LLP**
 3625 Ruffin Road, Suite 300
 3 San Diego, California 92123
 Telephone: (619) 297-6900
 4 djh@sdlaborlaw.com
 tjj@sdlaborlaw.com

5 Attorneys for Respondent/Counter-Petitioner
 6 Teamsters District Council 2, Local 388M

7 Stefan H. Black, Esq. (SBN 284499)
FordHarrison, LLP
 8 350 S. Grand Ave., Suite 2300
 Los Angeles, CA 90071
 9 Telephone: (213) 237-2400
 Facsimile: (213) 237-2401
 10 sblack@fordharrison.com

11 Attorneys for Petitioner / Counter-Respondent
 12 International Paper Company

13 **UNITED STATES DISTRICT COURT**
 14 **EASTERN DISTRICT OF CALIFORNIA**

15
 16 INTERNATIONAL PAPER
 COMPANY,

17 Petitioner/Counter-Respondent,

18 vs.

19 TEAMSTERS DISTRICT COUNCIL
 20 2, LOCAL 388M,

21 Respondent/Counter-Petitioner.
 22
 23

CASE NO.: 2:17-cv-1606-TLN-CKD

**STIPULATION AND ORDER TO
 CONTINUE MOTION TO VACATE
 ARBITRATION AWARD HEARING**

Judge: Hon. Troy L. Nunley
 Magistrate: Hon. Carolyn K. Delaney

1 Respondent/Counter-Petitioner Teamsters District Council 2, Local 388M
2 (“Local 388M”) and Petitioner/Counter-Respondent International Paper Company
3 (“IPC”), by and through their attorneys of record, stipulate to the following:

4 1. IPC’s motion to vacate the arbitration award is scheduled to be heard
5 by this Court on February 8, 2018 at 8:30 a.m. Therefore, IPC must file its
6 memorandum in support of its motion by January 11, 2018.

7 2. The Parties have engaged in extensive settlement discussions and have
8 reached agreement in principle on several key points. However, the holidays made
9 it difficult to resolve the few issues that remain outstanding. The Parties are
10 optimistic that a 30-day continuance will allow them to reach an agreement that
11 would resolve the underlying dispute in its entirety.

12 3. Pursuant to Local Rule 230(f), the Parties stipulate to a 30-day
13 continuance of the February 8, 2018 briefing schedule.

14 4. There is good cause to continue the hearing. A continuance will
15 facilitate settlement, avoid unnecessary expenditure of client funds, and prevent
16 devotion of Court resources to preparing for the hearing, which hopefully prove
17 unnecessary.

18 IT IS SO STIPULATED.

19 **HAYES & ORTEGA, LLP**

FORD & HARRISON LLP

20
21 By: By: /s/ Tracy J. Jones

By: /s/ Stefan H. Black

Dennis J. Hayes

Stephen R. Lueke

Tracy J. Jones

Stefan H. Black

22
23 Attorneys for Respondent/Counter-
24 Petitioner Teamsters District Council 2,
25 Local 388M

Attorneys for Petitioner/Counter-
Respondent International Paper
Company

ORDER

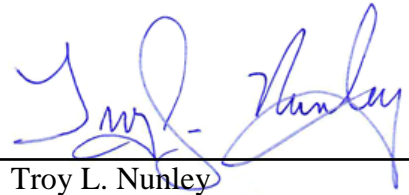
1
2 After review of the foregoing Stipulation, good cause appearing, **IT IS**
3 **HERBY ORDERED THAT:**

4 1. Petitioner/Counter Respondent International Paper Company’s Motion
5 to Vacate the Arbitration Award is continued from February 8, 2018 to March 8,
6 2018.

7 2. Briefing will proceed according to Code.
8

9 **IT IS SO ORDERED.**
10

11
12 Dated: January 3, 2018
13



14
15 Troy L. Nunley
16 United States District Judge
17
18
19
20
21
22
23
24
25
26
27
28