

1 MICHAEL J. STORTZ (SBN 139386)  
 michael.stortz@dbr.com  
 2 DRINKER BIDDLE & REATH LLP  
 50 Fremont Street, 20th Floor  
 3 San Francisco, California 94105-2235  
 Telephone: 415-591-7500  
 4 Facsimile: 415-591-7510

5 MARSHALL L. BAKER (SBN 300987)  
 marshall.baker@dbr.com  
 6 DRINKER BIDDLE & REATH LLP  
 1800 Century Park East, Suite 1500  
 7 Los Angeles, California 90067-1517  
 Telephone: 310-203-4000  
 8 Facsimile: 310-229-1285

9 Attorneys for Defendant  
 10 WBM LLC d/b/a WBM INTERNATIONAL

11 UNITED STATES DISTRICT COURT  
 12 EASTERN DISTRICT OF CALIFORNIA

14 RICHARD BERGKAMP, individually and on  
 behalf of all others similarly situated,  
 15  
 16 Plaintiffs,  
 17  
 v.  
 18 WBM LLC d/b/a WBM INTERNATIONAL,  
 and DOES 1-10, Inclusive,  
 19  
 20 Defendants.

Case No. 2:17-cv-02533-KJM-CKD

**STIPULATION AND ORDER FOR  
 ONE WEEK EXTENSION OF  
 DEFENDANT’S RESPONSIVE  
 PLEADING DEADLINE**

21  
 22  
 23  
 24  
 25  
 26  
 27  
 28

1 Plaintiff Richard Bergkamp (“Plaintiff”) and Defendant WBM LLC d/b/a WBM  
2 International (“WBM”) hereby stipulate to and agree to a one (1) week extension of WBM’s  
3 deadline to respond to Plaintiff’s First Amended Complaint (“FAC”) to and including February  
4 16, 2018, as follows:

5 WHEREAS, on December 1, 2017, WBM timely removed Plaintiff’s Original Complaint  
6 to this Court. *See* Dkt. No. 1;

7 WHEREAS, Plaintiff filed a Motion to Remand on January 8, 2018 and set the hearing on  
8 that motion for March 9, 2018, setting the hearing on that motion for March 9, 2018. *See* Dkt.  
9 No. 8;

10 WHEREAS, pursuant to a Stipulated Order, Plaintiff filed his FAC on January 19, 2018.  
11 *See* Dkt. Nos. 12 and 13.

12 WHEREAS, WBM’s response to Plaintiff’s FAC is currently set for February 9, 2018.  
13 *See* Dkt. No. 12;

14 WHEREAS, per minute order dated February 1, 2018, the Court vacated and reset the  
15 Pretrial Scheduling Conference and hearing on Plaintiff’s Motion to Remand for March 23, 2018.  
16 *See* Dkt. No. 14;

17 WHEREAS, pursuant to this Court’s Standing Order requiring pre-filing meet and confer  
18 prior to the filing of any motion, the parties have met and conferred and agreed to a one (1) week  
19 extension of WBM’s responsive pleading deadline; and

20 WHEREAS, the one (1) week scheduling modification provided herein will not otherwise  
21 impact any deadlines already set by the Court.

22 THEREFORE, IT IS HEREBY STIPULATED by the parties that:

23 (1) The deadline for WBM to respond to Plaintiff’s First Amended Complaint is  
24 extended to and including February 16, 2018.

25 IT IS SO STIPULATED.

26 ///

27 ///

28 ///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: February 7, 2018

DRINKER BIDDLE & REATH LLP

By: /s/ Marshall L. Baker  
Michael J. Stortz  
Marshall L. Baker

Attorneys for Defendant  
WBM LLC d/b/a WBM INTERNATIONAL

Dated: February 7, 2018

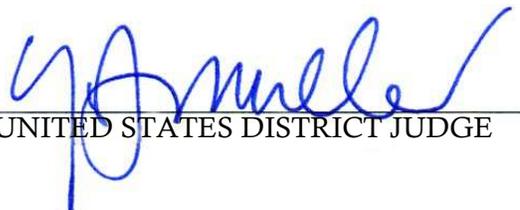
BESHADA FARNESE LLP

By: /s/ Peter J. Farnese (authorized on 2/7/2018)  
Peter J. Farnese

Attorneys for Plaintiff  
RICHARD BERGKAMP

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: February 12, 2018.

  
UNITED STATES DISTRICT JUDGE