

1 LAW OFFICES OF JON A DeRONDE, JR.
 John A. DeRonde, Jr. CFLS (SBN 59289)
 2 E-mail: derondelaw@sbcglobal.net
 416 Merganser Place
 3 Davis, CA 95616
 Telephone: (707) 631-8700
 4 Facsimile: (707) 756-1446

5 Attorney for Plaintiffs
 DELORES CONCEPCION; and
 6 ESTATE OF NANCY TOBIAS

7 SEYFARTH SHAW LLP
 8 Aaron Belzer, Esq. (State Bar No. 238901)
 E-mail: abelzer@seyfarth.com
 9 Julie M. Kamps (*admitted pro hac vice*)
 10 Email: jkamps@seyfarth.com
 2029 Century Park East, Suite 3500
 11 Los Angeles, CA 90067-3021
 Telephone: (310) 277-7200
 12 Facsimile: (310) 201-5219

13 Attorneys for Defendant
 14 FIDELITY WORKPLACE SERVICES, LLC
 (incorrectly identified as “Fidelity Investments”)
 15

16 **UNITED STATES DISTRICT COURT**
 17 **EASTERN DISTRICT OF CALIFORNIA**
 18 **SACRAMENTO DIVISION**

19	DELORES CONCEPCION; ESTATE OF)	CASE NO. 2:18-CV-01561-JAM-KJN
20	NANCY TOBIAS,)	
21	Plaintiffs,)	JOINT STIPULATION TO CONTINUE
)	HEARING DATE ON:
22	vs.)	(1) DEFENDANT’S MOTION TO DISMISS
)	(2) PLAINTIFF’S MOTION TO REMAND
23	FIDELITY INVESTMENTS, and DOES 1-10,)	[L.R. 230(f); L.R. 143]
24	Defendants.)	
25)	
26)	

1 **WHEREAS**, on July 24, 2018 Defendant Fidelity Workplace Services, LLC (incorrectly
2 named Fidelity Investments)(“Defendant”) filed a Motion to Dismiss Plaintiff’s Complaint, and
3 noticed the Motion for hearing on October 2, 2018 (Dkt. #10);

4 **WHEREAS**, on July 30, 2018, Plaintiff Delores Concepcion filed a Motion to Remand,
5 and also noticed the Motion for hearing on October 2, 2018 (Dkt. #15);

6 **WHEREAS**, Plaintiffs’ counsel will be out of town between September 27, 2018 and
7 October 10, 2018 and unavailable to appear at the hearing on the pending motions;

8 **WHEREAS**, the Parties have met and conferred in good faith, and have agreed to
9 continue the hearing on Defendants’ Motion to Dismiss and Plaintiff’s Motion to Remand;

10 **NOW THEREFORE**, the Parties, by and through their counsel, stipulate to continue the
11 hearing on the motions to October 16, 2018, or as soon thereafter as the Court may hear the
12 motions, with any oppositions or replies to be filed and served per the Local Rules and in
13 accordance with the new hearing date.

14 **IT IS SO STIPULATED.**

15 DATED: August 24, 2018

SEYFARTH SHAW LLP

17 By: /s/ Aaron Belzer
18 Destiny Brown

19 Attorneys for Defendant
FIDELITY WORKPLACE SERVICES, LLC

20 DATED: August 24, 2018

LAW OFFICES OF JOHN A. DERONDE, JR.

23 By: /s/ John A. DeRonde, Jr. (with consent)
24 John A. DeRonde, Jr.

25 Attorneys for Plaintiffs
DELORES CONCEPCION and
THE ESTATE OF NANCY TOBIAS

26 Pursuant to Local Rule 131(e), counsel for Plaintiffs has authorized submission of this
27 document on his behalf.

