

1 JEFFREY M. VUCINICH, ESQ. BAR#: 67906
 2 JOSHUA W. ROSE, ESQ. BAR#: 191024
 3 CLAPP, MORONEY, BELLAGAMBA and VUCINICH
 4 A PROFESSIONAL CORPORATION
 1111 Bayhill Drive, Suite 300
 San Bruno, CA 94066
 (650) 989-5400 (650) 989-5499 FAX

5 Attorneys for Defendants
 6 URI GELLER and EXPLOROLOGIST, LTD.

7
 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

10
 11 JOHN DOE aka BRIAN SAPIENT,
 12 Plaintiff,
 13 v.
 14 URI GELLER and EXPLOROLOGIST,
 LTD.,
 15 Defendants

CASE NO.: C07-2478 VRW

**STIPULATION AND ~~PROPOSED~~
 ORDER TO VACATE & CONTINUE 12-
 13-07 ADR/ENE DEADLINE UNTIL
 AFTER RULING ON DEFENDANTS'
 MOTION TO DISMISS**

Complaint filed: May 8, 2007
 Honorable Vaughn R. Walker

16
 17
 18 **THE PARTIES, BY AND THROUGH THEIR RESPECTIVE ATTORNEYS OF RECORD,**
 19 **HEREBY AGREE AND STIPULATE AS FOLLOWS:**

- 20 1. This matter was filed by plaintiff JOHN DOE A/K/A BRIAN SAPIENT on May 8,
 21 2007.
- 22 2. Defendants URI GELLER and EXPLOROLOGIST, LTD. are represented by lead
 23 attorney, Richard Winelander, Esq., admitted Pro Hac Vice, and by local counsel, Jeffrey Vucinich,
 24 Esq.
- 25 3. On September 14, 2007, Honorable Judge Vaughn R. Walker ordered the parties to
 26 complete ADR/ENE within 90 days, or by December 13, 2007.
- 27 4. Defendants' motion to dismiss/transfer is set to be heard on December 6, 2007. An
 28 initial case management conference is set for the same day.

1 5. The parties have met and conferred on all issues as required by the Order Setting the
2 Case Management Conference.

3 6. The parties believe that a ADR/ENE session by December 13, 2007, will be not
4 fruitful, even if a ruling by the Court on defendants' motions is not made by that date. When the Court
5 made the ADR/ENE order, the Court and the parties contemplated a November 2007 initial case
6 management conference.

7 7. The parties and their counsel have filed their executed ADR Certifications.

8 8. The parties agree, stipulate and respectfully request that the Court make an order to
9 vacate the ADR/ENE deadline of December 13, 2007.

10 9. The parties agree, stipulate and respectfully request that the Court make an order to
11 allow the parties to file, no later than 14 days after its ruling on defendants' motions, a proposed
12 schedule for completion of ADR.

13 IT IS SO STIPULATED.

14 Date: THE WINELANDER LAW GROUP

15
16 By: _____ /s/
17 Richard Winelander, Esq. (*pro hac vice*)
18 Attorney for Defendants,
URI GELLER and EXPLOROLOGIST, LTD.

19 Date: CLAPP, MORONEY,
20 BELLAGAMBA & VUCINICH

21 By: _____ /s/
22 Jeffrey M. Vucinich, Esq.
23 Attorney for Defendants,
URI GELLER and EXPLOROLOGIST, LTD.

24 Date: Electronic Frontier Foundation

25
26 By: _____ /s/
27 Corynne McSherry, Esq.
28 Attorney for Plaintiff,
John Doe aka Brian Sapient

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

ADR/ENE COMPLIANCE ORDER

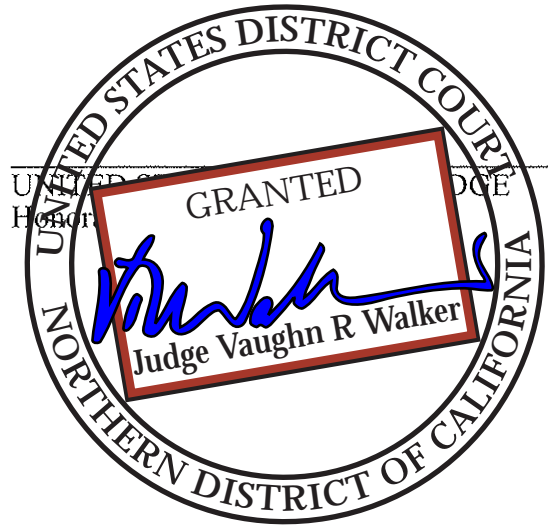
THIS STIPULATION having been reviewed by the Court, and good cause appearing, the Court orders as follows:

The ADR/ENE deadline of December 13, 2007 is vacated; and

The parties shall file, no later than 14 days after the Court's ruling on defendants' motion to dismiss/transfer, file a proposed schedule for completion of ADR.

IT IS SO ORDERED.

Dated: Dec. 7, 2007



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

JOHN DOE aka BRIAN SAPIENT v. URI GELLER, et al.

United States District Court, Northern District of California Case No. C07-2478 VRW

PROOF OF SERVICE

I, the undersigned, hereby declare that I am over the age of eighteen years and not a party to the within action. My business address is 1111 Bayhill Drive, Suite 300, San Bruno, CA 94066. On the date indicated below, I served the within:

**STIPULATION AND [PROPOSED] ORDER TO VACATE & CONTINUE 12-13-07
ADR/ENE DEADLINE UNTIL AFTER RULING ON DEFENDANTS' MOTION TO
DISMISS**

on the parties in this action by transmitting a true copy of the foregoing document(s) in the following manner:

<p>Jason M. Schultz, Esq. Corynne McSherry, Esq. Marcia Hofmann, Esq. Electronic Frontier Foundation 454 Shotwell Street San Francisco, CA 94110 Tel: (415) 436-9333 ext. 112 Fax: (415) 436-9993 <i><u>Attys for Plaintiff John Doe aka Brian Sapien</u></i></p>	<p>Richard Winelander, Esq. 1005 North Calvert Street Baltimore, MA 21202 Tel: (410) 576-7980 Fax: (443) 378-7503 e-mail: rw@righverdict.com <i><u>Attys Pro Hac Vice for Uri Geller and Explorologist, Ltd.</u></i></p>
---	--

(BY MAIL) Pursuant to Code of Civil Procedure §1013(a), I placed a true copy thereof enclosed in a sealed envelope, addressed as set forth above, and deposited each envelope with postage fully prepaid to be placed for collection and mailing following the ordinary business practices of Clapp, Moroney, Bellagamba & Vucinich. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing of in affidavit.

(BY PERSONAL SERVICE) I caused to be delivered by hand this date each of the above documents, to the following:

(BY FACSIMILE) I caused each of the above documents to be faxed this date to the offices of the following:

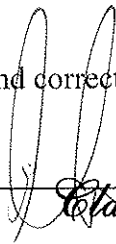
(BY FEDEX) I caused each of the above documents to be sent by FedEx this date to the offices of the following:

(BY ECP PACER) I caused to be delivered by EPC Pacer this date each of the above documents, for which our office will maintain the EPC Pacer filing receipt, to the following:

Executed on November 29, 2007 at San Bruno, California. I declare under penalty of perjury

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

under the laws of the State of California that the foregoing is true and correct.



Claudia Gomez