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11 Attorney for Defendant and Counter-Claimant MICHAEL PARRY
 12 and for all other similarly situated, counter-claimants

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

15 NATIONAL SEATING & MOBILITY, INC.,

16 Plaintiff,

17 vs.

18 MICHAEL PARRY and DOES 1 through 20;
 19 inclusive,

20 Defendants.

21
 22 MICHAEL PARRY, individually and on behalf
 of all others similarly situated,

23 Counter-Claimant,

24 vs.

25 NATIONAL SEATING & MOBILITY, INC.,

26 Counter-Claim Defendant.
 27

Case No. 3:10-cv-02782-JSW

**PLAINTIFF AND COUNTER-CLAIM
 DEFENDANT NSM'S AND
 DEFENDANT AND COUNTER-
 CLAIMANT MICHAEL PARRY'S
 STIPULATION TO CONTINUE
 PARRY'S DEADLINE TO MOVE FOR
 CLASS CERTIFICATION and
 PROPOSED ORDER**

Action Filed: March 3, 2010

STIPULATION RE CLASS CERTIFICATION DEADLINE AND ~~PROPOSED~~ ORDER

[CASE No. 3:10-cv-02782-JSW]

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1 It is hereby stipulated by and between the parties hereto, by and through their respective
2 counsel of record, Wilson, Elser, Moskowitz, Edelman & Dicker LLP representing National
3 Seating & Mobility, Inc. ("NSM") and Mark P. Meuser representing Michael Parry ("Parry"),
4 subject to the order of the court, as follows:

5 Pursuant to the Court's Order Vacating Case Management Conference and Setting Case
6 Management Deadlines, dated October 4, 2010, Mr. Parry's deadline to file a Motion for Class
7 Certification is currently May 6, 2011. Due to scheduling difficulties, Mr. Parry has not been
8 able to complete a 30(b)(6) deposition, which is critical to Mr. Parry's ability to adequately
9 prepare his motion.

10 As such, the parties request that the Court allow Mr. Parry to file his Motion for Class
11 Certification on or before May 27, 2011. The parties have agreed to complete the necessary
12 deposition during the week of May 9, 2011, if the Court is amenable to the requested extension.
13 The other deadlines established in the Court's October 4, 2010 Order, including the scheduled
14 date for the hearing on Mr. Parry's class certification motion (September 16, 2011), will remain
15 unchanged as to minimize any inconvenience to the Court.

16 Dated: April 15, 2011

Respectfully submitted,

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18 WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER, LLP

19 By: /s/
20 Ronald S. Bushner
21 Megan M. Lewis
22 *Attorneys for Plaintiff/Counter-claim
Defendant*

23 Dated: April 15, 2011

Respectfully submitted,

24 MEUSER LAW GROUP, INC.

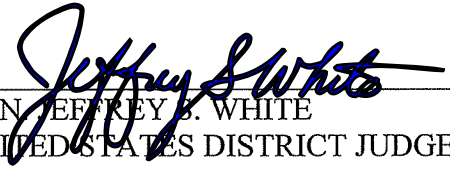
25 By: /s/
26 Mark P. Meuser
27 *Attorneys for Defendant/Counter-claimant*

~~PROPOSED~~ ORDER

1
2 Good cause appearing therefore, the Stipulation and Proposed Order is hereby adopted by
3 the Court. Defendant/Counter-claimant Parry's Motion for Class Certification must be filed on
4 or before May 27, 2007. The other dates ~~specified in _____ have not changed.~~ relating to the briefing schedule
5 and the hearing remain
6 unchanged.

7 IT IS SO ORDERED.

8
9
10 Dated: April 15, 2011

By: 
HON. JEFFREY B. WHITE
UNITED STATES DISTRICT JUDGE