

1 GOLD BENNETT CERA & SIDENER LLP  
 SOLOMON B. CERA (State Bar No. 99467)  
 2 GWENDOLYN R. GIBLIN (State Bar No. 181973)  
 C. ANDREW DIRKSEN (State Bar No. 197378)  
 3 595 Market Street, Suite 2300  
 San Francisco, California 94105  
 4 Telephone: (415) 777-2230  
 Facsimile: (415) 777-5189  
 5 E-mail: scera@gbcslaw.com  
 E-mail: ggiblin@gbcslaw.com  
 6 E-mail: cdirksen@gbcslaw.com

7 COHEN MILSTEIN SELLERS & TOLL, PLLC  
 HERBERT E. MILSTEIN  
 8 JOSHUA S. DEVORE  
 MATTHEW KAPLAN  
 9 1100 New York Ave., NW  
 Suite 500, West Tower  
 10 Washington, DC 20005-3965  
 Telephone: (202) 408 4600  
 11 hmilstein@cohenmilstein.com  
 jdevore@cohenmilstein.com  
 12 mkaplan@cohenmilstein.com

13 Attorneys for Plaintiffs  
 and All Others Similarly Situated  
 14

15 UNITED STATES DISTRICT COURT  
 16 NORTHERN DISTRICT OF CALIFORNIA

17 EDGAR W. TUTTLE; ERIC BRAUN; THE )  
 BRAUN FAMILY TRUST by its co-trustee )  
 18 ERIC BRAUN; and WENDY MEG SIEGEL, )  
 on behalf of themselves and )  
 19 all others similarly situated, )

Case No.: 10-CV-03588 (WHA)

**STIPULATION PURSUANT TO CIVIL  
 L.R. 6-2 TO ACCELERATE TIME FOR  
 BRIEFING AND HEARING MOTION TO  
 CONTINUE PRETRIAL AND TRIAL  
 DATES AND ~~PROPOSED~~ ORDER**

20 Plaintiffs, )  
 21 )  
 22 )

v. )  
 23 )  
 24 )

SKY BELL ASSET MANAGEMENT, LLC )  
 et al. )

25 Defendants. )

26 WHEREAS the Court has issued an Order Granting Request to File Motion to Continue  
 27 Pretrial and Trial Dates (“Order”) (Dkt. 295); and

28 WHEREAS in light of the nature and timing of the relief requested in the Plaintiffs’

1 Précis Seeking Leave To File Motion To Continue Pretrial And Trial Dates (“Plaintiffs’ Précis”)  
2 (Dkt. 292) and the fact that defendant Rothstein, Kass and Company, P.C. (“Rothstein Kass”)  
3 does not oppose the requested relief (Dkt. 293); and

4 WHEREAS the parties hereto agree that a motion to continue the pretrial and trial dates  
5 is a matter of urgency given imminent deadlines and the recent appearance of co-counsel on  
6 behalf of Plaintiffs, as ordered by the Court;

7 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and defendant  
8 Rothstein Kass, pursuant to Civil L.R. 6-2, as follows:

9 1. Pursuant to the Order, Plaintiffs will file a motion to continue all pretrial and trial  
10 dates, consistent with the dates set forth in Plaintiffs’ Précis, on or before December 28, 2011;  
11 and

12 2. Defendant Rothstein Kass will not oppose such motion; and

13 3. The parties request that the motion be heard on an expedited basis on Friday,  
14 January 6, 2012 at a time convenient to the Court to permit, *inter alia*, Maxwell Blecher, Esq. of  
15 Blecher & Collins to be present in Court on behalf of Rothstein Kass, as well as an attorney from  
16 Cohen Milstein Sellers & Toll, PLLC on behalf of Plaintiffs; and

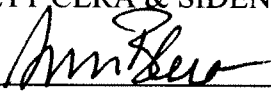
17 4. The parties request that if the January 6, 2012 date is unavailable to the Court, the  
18 hearing proceed on the afternoon of January 5, 2012 at a time convenient to the Court.

19 4. The deadlines for exchange of all expert reports as set forth in this Court’s  
20 December 7, 2011 Scheduling Order (Dkt. 285) are extended by a period of fourteen (14) days to  
21 allow the Court to consider the motion for continuance before such exchanges occur.

22 **IT IS SO STIPULATED.**

23 Dated: December 22, 2011

GOLD BENNETT CERA & SIDENER LLP

24 By:   
25 Solomon B. Cera

- and -

26 COHEN MILSTEIN SELLERS & TOLL, PLLC

27 Attorneys for Plaintiffs and  
28 All Others Similarly Situated

1 Dated: December 22, 2011

BLECHER & COLLINS PC

2 By: 

3 Maryann R. Marzano

4 515 South Figueroa Street, Suite 1750

Los Angeles, CA 90017-3334

5 Tel.: (213) 622-4222

Email: mmarzano@blechercollins.com

6 - and -

HODGSON RUSS LLP

7 Joel M. Wolosky

8 1540 Broadway, 24th Floor

New York, NY 10036

9 Tel.: (212)751-4300

10 Fax: (212) 751-0928

Email: jwolosky@hodgsonruss.com

11 Attorneys for Defendant

12 Rothstein Kass & Company, P.C.

13 **ORDER**

14 PURSUANT TO STIPULATION, IT IS SO ORDERED. The hearing on the motion for  
15 continuance of all pretrial and trial dates shall occur on January 6, 2012 at 2:00 p.m.

16  
17 Dated: December 23, 2011.

  
18 William Alsup

19 UNITED STATES DISTRICT JUDGE