

1 Kenneth D. Freundlich (SBN119806)
 FREUNDLICH LAW
 2 16133 Ventura Blvd. Suite 1270
 Encino, CA 91436
 3 P: (310) 377-3790
 F: (310) 275-5351
 4 E-Mail: ken@freundlichlaw.com

5 Attorneys for Plaintiffs
 Musical Kidz, LLC itself and doing business as Music For Little People (which was
 6 erroneously sued as a dissolved California corp.), For Future Generations, Inc. and Leib
 Ostrow
 7

8
 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA

11 YSAYE BARNWELL, an individual;
 12 AISHA KAHILL, an individual; CAROL
 MAILLARD, an individual; NITANJU B.
 13 CASSEL, an individual; and LOUISE
 ROBINSON, an individual, collectively
 14 p/k/a/ "SWEET HONEY IN THE ROCK",

15 Plaintiffs,

16 vs.

17 MUSICAL KIDZ, LLC, a California
 limited liability company; FOR FUTURE
 18 GENERATIONS, INC. , a dissolved
 California corp.; MUSIC FOR LITTLE
 19 PEOPLE, a dissolved California corp.;
 TRUDY CORPORATION, a Connecticut
 20 Corp., and LEIB OSTROW, an individual;
 and DOES 1 through 50, inclusive,

21 Defendants.
 22
 23
 24
 25
 26

Case No. C 10-04119 JCS

Transferred from Central District Case
 No. CV10-1614 MMM (JCx)

**SECOND STIPULATION (NDCA)
 SETTING TIME TO RESPOND TO
 INITIAL COMPLAINT AND TO
 EXTEND TIME TO FILE RULE 26
 (F) STATEMENT AND
 RESCHEDULING INITIAL CASE
 MANAGEMENT CONFERENCE**

**[PROPOSED] ORDER SUBMITTED
 SEPARATELY AS PDF
 ATTACHMENT TO THIS
 DOCUMENT**

**OLD INITIAL CONFERENCE
 DATE:**

JANUARY 7, 2011; 1:30 P.M.

**NEW INITIAL CONFERENCE
 DATE:**

JANUARY 28, 2011; 1:30 P.M.

1 WHEREAS, on September 7, 2010, the United States District Court for the Central
2 District of California, the Honorable Margaret M. Morrow, granted the motion of
3 Defendants Musical Kidz, LLC, For Future Generations, Inc., Music For Little People, and
4 Leib Ostrow (the “Served Defendants”) to transfer the venue of this action to the United
5 States District Court for the Northern District of California; and

6 WHEREAS, on September 14, 2010, the Complaint in this action was listed as being
7 filed in the United States District Court for the Northern District of California; and

8 WHEREAS, the Served Defendants, pursuant to stipulation, have not filed their
9 responses to the Complaint after it was transferred; and

10 WHEREAS, Plaintiffs and the Served Defendants have agreed to a settlement in
11 principle of all outstanding issues which is in the process of being documented by the
12 parties and which will result in a dismissal of this entire action, and

13 WHEREAS, a settlement among these parties will resolve all issues in this matter as
14 to all Defendants; and

15 WHEREAS, to facilitate the settlement process, Plaintiffs and the Served Defendants
16 would like a brief extension of all deadlines so that they may concentrate on settlement
17 instead of litigation.

18 NOW THEREFORE, the parties hereto, by and through their respective counsel of
19 record hereby stipulate and agree as follows:

20 1. The Served Defendants time to plead in response to the initial complaint shall
21 be extended so that the Served Defendants’ responsive pleading will now be due on or
22 before January 7, 2011.

23 2. The Scheduling Conference will be rescheduled from January 7, 2011 at 1:30
24 p.m. to January 28, 2011 at 1:30 p.m. and the Rule 26 (f) report will be filed on or before
25 January 21, 2011.

26 **IT IS SO STIPULATED.**

27
28

1 Dated: December 6, 2010

LAW OFFICE OF REGINALD K. BROWN
Reginald K. Brown

2 _____
3 _____

By: /s/
Reginald K. Brown
Attorneys for Plaintiffs Ysaye Barnwell,
Aisha Kahill, Hitanju B. Cassel and
Louise Robinson, collectively p/k/a/
"Sweet Honey In The Rock"


6 Dated: December 6, 2010

FREUNDLICH LAW
Kenneth D. Freundlich

7
8 
9 By: _____ :

Kenneth D. Freundlich
Attorneys for Defendants Musical Kidz,
LLC itself and doing business as Music
For Little People (which was erroneously
sued as a dissolved California corp.), For
Future Generations, Inc. and Leib Ostrow

14
15 I received e-mail confirmation from Mr. Brown that I should affix the '/s/' to
16 his signature line and I have done so.

18 By:
19 
20 _____ :

Kenneth D. Freundlich

23 Dated: December 8, 2010

