

1 WAUKEEN Q. McCOY, ESQ. (SBN: 168228)
LAW OFFICES OF WAUKEEN Q. McCOY
2 703 Market Street, Suite 1300
San Francisco, California 94103
3 Telephone (415) 675-7705
Facsimile (415) 675-2530
4

5 SHYAMALA T. RAJENDER, ESQ. (SBN: 69806)
RAJENDER LAW OFFICES
703 Market Street, Suite 1300
6 San Francisco, California 94103
Telephone (415) 348-1600
7 Facsimile (415) 675-2530

8 Attorneys for Plaintiff
REBECCA COOPER
9

10 VILLARREAL HUTNER & TODD PC
LARA VILLARREAL HUTNER, ESQ., Cal. Bar No. 178639
11 E-Mail: lhutner@vhtattorneys.com
JESSICA N. LEAL, ESQ., Cal Bar No. 267232
12 E-Mail: jleal@vhtattorneys.com

575 Market Street, Suite 300
13 San Francisco, California 94105
Telephone: 415.543.4200
14 Facsimile: 415.512.7674

15 Attorneys for Defendant
UNITED PARCEL SERVICE, INC.,
16 an Ohio Corporation
(erroneously named as "UNITED PARCEL
17 SERVICE OF AMERICA, INC.")

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
20

21 REBECCA COOPER, an individual,

22 Plaintiff,

23 v.

24 UNITED PARCEL SERVICE OF AMERICA,
INC., and DOES 1-50,

25 Defendants.
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Case No. CV 10-04764 CRB

**JOINT STIPULATION AND [PROPOSED]
ORDER TO RESCHEDULE
CASE MANAGEMENT CONFERENCE**

Date: February 10, 2012

Time: 8:30 a.m.

Judge: Hon. Charles R. Breyer

1 Plaintiff Rebecca Cooper (hereinafter "Plaintiff"), through her counsel Law Offices of
2 Waukeen Q. McCoy and Rajender Law Offices, and Defendant United Parcel Service, Inc.
3 (erroneously named as United Parcel Service of America, Inc., hereinafter "UPS"), through its
4 counsel Villarreal Hutner & Todd PC, (collectively "the Parties") do hereby agree and stipulate to
5 reschedule the February 10, 2012 case management conference for good cause for the reasons set
6 forth below, and as supported by the Declaration of Waukeen Q. McCoy.

7 1. On November 4, 2011, the Court ordered the Parties to a settlement conference
8 with Magistrate Judge Maria Elena James on February 1, 2012.

9 2. A case management conference is currently on calendar for February 10, 2012. On
10 January 18, 2012, Plaintiff's counsel notified UPS that he had a conflict with the February 10,
11 2012 date for the case management conference.

12 3. ~~While the parties were meeting and conferring on a new date for the case~~
13 management conference, counsel received a Notice of Continuance of Settlement Conference,
14 which changed the date of the settlement conference from February 1, 2012, to April 6, 2012.

15 4. Due to counsel for UPS's prescheduled vacation during this time, the Court granted
16 the Parties' stipulated request to continue the settlement conference to April 25, 2012.

17 5. Now that the settlement conference has been rescheduled for April 25, 2012, the
18 Parties respectfully submit this joint request that the Court reschedule the case management
19 conference to a date after April 25, 2012.

20 6. Counsel for the Parties each believe that a case management conference will be
21 most meaningful after the completion of the April 25, 2012 settlement conference with Magistrate
22 Judge James. As a result, the request to reschedule the February 10, 2012 case management
23 conference is being made jointly, for good cause, and by stipulation.

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1 SO STIPULATED:

2 Dated: January 27, 2012

LAW OFFICES OF WAUKEEN Q. McCOY, and
RAJENDER LAW OFFICES

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4

5

By

WAUKEEN Q. McCOY
SHYAMALA T. RAJENDER

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Attorneys for Plaintiff
REBECCA COOPER

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9 Dated: January 27, 2012

VILLARREAL HUTNER & TODD PC

10

11

By

LARA VILLARREAL HUTNER
JESSICA N. LEAL

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Attorneys for Defendant
UNITED PARCEL SERVICE, INC.,
an Ohio Corporation (erroneously named as "UNITED
PARCEL SERVICE OF AMERICA, INC.")

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17 IT IS SO ORDERED that:

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1. The February 10, 2012 case management conference is taken off calendar.

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2. The Parties' next case management conference will be rescheduled after the April

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25, 2012 settlement conference with Magistrate Judge James, on April 27, 2012.

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Dated: Jan. 30, 2012 . 2012 By

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