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 UNIVERSITY OF NORTHERN
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 and Y. KING LIU
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8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

11 JOHN STALCUP, DENNIS McGOWAN,
 12 and MICHAEL LYSTER,

13 Plaintiffs,

14 vs.

15 Y. KING LIU, UNIVERSITY OF
 16 NORTHERN CALIFORNIA
 FOUNDATION,
 17

18 Defendants.

Case No. C 11-00002 JSW

**STIPULATION TO CONTINUE CASE
 MANAGEMENT CONFERENCE
 ORDER THEREON AND ORDER
 REGARDING MOTION HEARING**
 DATE: April 15, 2011
 TIME: 1:30pm
 COURTROOM: 2, 17th floor
 JUDGE: Hon. Jeffrey White

1 Pursuant to Local Rule 6-2, Plaintiffs John Stalcup, Dennis McGowan, and Michael Lyster, and
2 Defendants University of Northern California Foundation (“UNCF”) and Y. King Liu (Chairman of the
3 Board, University of Northern California Foundation) hereby stipulate and agree to continue the case
4 management conference by approximately six weeks.

5 Previously, the parties have stipulated to extensions of time regarding Defendants' deadlines to
6 file a motion to dismiss or otherwise respond to the complaint and Plaintiffs' deadline to file a motion
7 for remand. [Docket Nos. 8 and 10] Such extensions were intended to facilitate the parties' settlement
8 discussions, in an effort to resolve this case in an efficient manner.

9 On March 1, 2011, the parties engaged in private mediation in an attempt to resolve their
10 disputes. On March 21, 2011, Plaintiffs provided Defendants with a term sheet for consideration. The
11 parties are still, therefore, engaged in settlement discussions. Under the current schedule, however, the
12 Court's initial case management conference is set for April 15, 2011; the parties' Joint Case Management
13 Statement and initial disclosures under Rule 26(a)(1) are currently due on April 8, 2011; and the parties
14 must meet and confer under Rule 26(f)(1) by March 25, 2011. Continuance of the case management
15 conference and, accordingly, all other deadlines triggered by the date of that conference, will help to
16 facilitate the parties' ongoing settlement discussions.

17 Accordingly, the parties request that the Court's initial case management conference be
18 continued from April 15, 2011 to June 10, 2011 or any date shortly thereafter, excluding the period of
19 July 15-31, 2011, when counsel are not available. (Alternatively, if the Court is unavailable on June 10,
20 2011, then the parties would agree to a case management conference for May 27, 2011).

21 The parties do not believe that this modest extension of time will have any effect on the schedule
22 for this case.

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1 IT IS SO STIPULATED THIS 23rd day of March, 2011.

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3 Dated: March 23, 2011

HOGAN LOVELLS US LLP

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5 By: /s/ Constance F. Ramos
6 Constance F. Ramos
7 Attorneys for Defendants UNIVERSITY OF
8 NORTHERN CALIFORNIA FOUNDATION
9 and Y. KING LIU


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11 Dated: March 23, 2011

FLAXMAN & BLAKELY

12 By: /s/ Bruce W. Blakely
13 Bruce W. Blakely
14 Attorneys for Plaintiffs JOHN STALCUP,
15 DENNIS McGOWAN, and MICHAEL
16 LYSTER

17 The Initial Case Management Conference is continued to June 10, 2011 at 1:30. IT IS SO
18 **ORDERED. If the parties also seek a continuance of the motion hearing scheduled for March 25,**
19 **2011 at 9:00 a.m., they should submit the appropriate request to the Court.**

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March 23, 2011


JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE

I, Constance F. Ramos, attest that Bruce W. Blakely has read and approved the STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE and consents to its filing in this action.