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8 **UNITED STATES DISTRICT COURT**  
 9 **NORTHERN DISTRICT OF CALIFORNIA**  
 10

11 JON J. CORDOVA,

12 Plaintiff,

13 v.

14 CONVERGYS CORPORATION,

15 Defendant.  
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Case No. C 11-00333 RS

**STIPULATION AND [PROPOSED]  
 ORDER FOR A HOLD ON CASE-  
 RELATED DATES AND FOR A INITIAL  
 CASE MANAGEMENT CONFERENCE**

1 WHEREAS the Court has scheduled a June 9, 2011 Initial Case Management  
2 Conference, which requires the preparation and filing of a Joint Case Management Statement by  
3 June 2, 2011;

4 WHEREAS the parties have other upcoming case-related dates, including for answering  
5 the First Amended Complaint, filing of a Second Amended Complaint, and Initial Disclosures;

6 WHEREAS the parties have had informal settlement disclosures, and would like to  
7 continue these discussions without having to incur further litigation-related expenses related to  
8 these upcoming court and case-related dates;

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10 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by plaintiff Jon J.  
11 Cordova and defendant Convergys Corporation, by and through their respective counsel, that  
12 they hereby jointly request that the Court impose a 30-day hold on this case, during which the  
13 parties will not be required to file with the Court or serve on each other any case-related  
14 documents which would otherwise be required without this hold. The 30-day hold will run from  
15 May 26, 2011 through June 26, 2011. Cordova will have until July 7, 2011 to file (a) his  
16 amended fraud claims in a Second Amended Complaint, (b) a stipulation authorizing the filing of  
17 an amended complaint alleging additional claims with a Second Amended Complaint, or (c) a  
18 motion requesting leave to file a Second Amended Complaint alleging additional claims, if any.  
19 Convergys shall have until two weeks after the filing of an amended complaint to file a  
20 responsive pleading, or until July 21, whichever is later.

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22 The Court shall schedule an Initial Case Management Conference on a date convenient  
23 with its calendar on July 21, 2011, or other date available to the Court, assuming the case has not  
24 settled and a Request for Dismissal is not submitted to the Court prior to said date. The parties  
25 shall submit a Case Management Statement one week prior to the Case Management Conference.  
26 The parties shall also mutually agree on a date after June 26 for service of Initial Disclosures,

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