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6 Attorneys for Defendant
 SONY COMPUTER ENTERTAINMENT AMERICA LLC

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

12 HENRY GARCIA, On Behalf of Himself,
 13 All Others Similarly Situated and the
 14 General Public,

15 Plaintiff,

16 v.

17 SONY COMPUTER
 ENTERTAINMENT AMERICA LLC,

18 Defendant.

CASE NO. CV-11-2246 RS

**STIPULATION AND [PROPOSED]
 ORDER CONTINUING DEADLINE TO
 RESPOND TO COMPLAINT AND
 SCHEDULING BRIEFING AND HEARING
 FOR MOTION TO DISMISS AND
 MOTION TO STAY DISCOVERY**

Judge: Hon. Richard Seeborg
 Dept: Courtroom 3

1 Counsel for defendant Sony Computer Entertainment America LLC (“SCEA”) and
2 plaintiff Henry Garcia have conferred regarding SCEA’s intention to file a motion to dismiss and
3 motion to stay discovery in response to the Complaint. Based in part on SCEA’s counsel’s
4 absence due to vacation plans, Mr. Garcia’s counsel have agreed to extend SCEA’s deadline to
5 respond to the Complaint, which is otherwise May 31, 2011. To increase efficiencies, the parties
6 have also agreed to request that the Court consolidate the hearing regarding SCEA’s motions to
7 dismiss and stay discovery with the Case Management Conference scheduled on August 25,
8 2011.

9 Further, the parties have agreed to hold a Fed. R. Civ. P. 26 conference on June 29, 2011.

10 Based on the foregoing and pursuant to Local Rule 6-1 of the Northern District of
11 California, the parties, by and through their attorneys of record, hereby stipulate and agree to
12 extend SCEA’s deadline to respond to the Complaint and schedule the briefing and hearing of
13 SCEA’s motions to dismiss and stay discovery as follows:

14 1. July 7, 2011 – SCEA’s last day to file its motion to dismiss and motion to stay
15 discovery.

16 2. July 28, 2011 – Plaintiff’s last day to file his opposition to SCEA’s motion to
17 dismiss and motion to stay discovery.

18 3. August 11, 2011 – SCEA’s last day to file reply briefs in support of its motion to
19 dismiss and motion to stay discovery

20 4. August 25, 2011, 1:30 P.M. – Hearing regarding SCEA’s motion to dismiss and
21 motion to stay discovery. The Case Management Conference scheduled on August 25, 2011 at
22 10:00 A.M. will be continued to August 25, 2011 at 1:30 P.M., to take place with the hearing.

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1 The parties have not previously requested a modification of these dates or deadlines.
2 Dated: May 31, 2011

3 BLOOD HURST & O'REARDON, LLP

4 CASEY GERRY SCHENK FRANCAVILLA
5 BLATT & PENFIELD, LLP

6 DAVID LIZERBRAM & ASSOCIATES

7 By: /s/ Timothy Blood

8 Timothy G. Blood
9 *Counsel for Plaintiff Henry Garcia*

10 Dated: May 31, 2011

11 DLA PIPER LLP (US)

12 By: /s/ Carter Ott

13 LUANNE SACKS
14 CARTER OTT
15 *Counsel for Defendant Sony Computer
16 Entertainment America LLC*

17 I, Carter Ott, am the ECF user whose identification and password are being used to file the
18 foregoing Stipulation And [Proposed] Order Continuing Deadline To Respond To Complaint And
19 Scheduling Briefing And Hearing For Motion To Dismiss And Motion To Stay Discovery. I
20 hereby attest that the above-referenced signatory to this stipulation has concurred in this filing.

21 **ORDER**

22 PURSUANT TO STIPULATION, IT IS SO ORDERED:

23 1. SCEA shall file its motion to dismiss and motion to stay discovery on or before
24 July 7, 2011.

25 2. Plaintiff shall file his opposition to SCEA's motion to dismiss and motion to stay
26 discovery on or before July 28, 2011.

27 3. SCEA shall file any reply briefs in support of its motion to dismiss and motion to
28 stay discovery on or before August 11, 2011.


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4. The hearing regarding SCEA's motion to dismiss and motion to stay discovery shall be on August 25, 2011, at 1:30 P.M.

5. The Case Management Conference scheduled on August 25, 2011 at 10:00 A.M. is continued to August 25, 2011 at 1:30 P.M.

Dated: 6/1, 2011

By: 

Honorable Richard Seeborg
United States District Court Judge