

1 **Stuart B. Wolfe (SBN 156471)**  
**Brian H. Gunn (SBN 192594)**  
2 **W. Brian Jones (SBN 251889)**  
*wbjones@wolfewyman.com*  
3 **WOLFE & WYMAN LLP**  
**2175 N. California Blvd., Suite 645**  
4 **Walnut Creek, California 94596-3502**  
**Telephone: (925) 280-0004**  
5 **Facsimile: (925) 280-0005**

6 **Attorneys for Defendant**  
**CITIBANK, NATIONAL ASSOCIATION, as**  
7 **successor by merger to Citibank (South Dakota), N.A**

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

11 **ADAM EL-AHEIDAB,**

12 **Plaintiff,**

13 **v.**

14 **CITIBANK (SOUTH DAKOTA), N.A., and**  
**DOES 1 through 25, inclusive,**

15 **Defendants.**

Case No.: 3:11-cv-05359-EMC

**STIPULATION AND [PROPOSED] ORDER**  
**CONTINUING CASE MANAGEMENT**  
**CONFERENCE**

Current CMC

Date: March 9, 2012

Time: 9:00 a.m.

Place: Courtroom 5, 17th Floor

Assigned to the Hon. Edward M. Chen

18  
19 **COME NOW** Defendant CITIBANK, NATIONAL ASSOCIATION, as successor by merger  
20 to Citibank (South Dakota), N.A. (“Citibank”) and Plaintiff ADAM EL-AHEIDAB (“Plaintiff”)  
21 (collectively, “the Parties”), and hereby stipulate as follows:

22 **WHEREAS,** the Court scheduled a case management conference for March 9, 2012;

23 **WHEREAS,** the Court granted Citibank’s Motion to Dismiss Plaintiff’s Complaint;

24 **WHEREAS,** Plaintiff’s deadline to file a First Amended Complaint will not expire before the  
25 case management conference as currently scheduled, and the case will not be at issue at that time or  
26 otherwise ripe for case management;

27 **NOW, THEREFORE,** the Parties stipulate and agree that the Court’s case management  
28 conference shall be continued to April 13, 2012, or another date thereafter that is convenient for the



1 Court. The Parties further stipulate that all deadlines contained in the Court's "Order Setting initial  
2 Case Management Conference and ADR Deadlines" shall comport with the continued Case  
3 Management Conference date.

4  
5 IT IS SO STIPULATED.

6 DATED: March 1, 2012

WOLFE & WYMAN LLP

7  
8 By: /s/ W. Brian Jones SBN 251889

STUART B. WOLFE

BRIAN H. GUNN

W. BRIAN JONES

Attorneys for Defendant

CITIBANK, NATIONAL ASSOCIATION, as  
successor by merger to Citibank (South Dakota),  
N.A.

9  
10  
11  
12 DATED: March 1, 2012

DOWLING & MALQUEZ  
BECKMAN MALQUEZ & DOWLING, LLP

13  
14  
15 By: \_\_\_\_\_

CURTIS F. DOWLING, ESQ.

Attorneys for Plaintiff

ADAM EL-AHEIDAB

16  
17  
18 **[PROPOSED] ORDER**

19 The Court, having reviewed the Stipulation Continuing Case Management Conference, and  
20 Good Cause appearing therefore, makes the following Order:

21 The Case Management Conference currently scheduled for March 9, 2012 at 9:00 a.m., is  
22 hereby continued to April 13, 2012, and all deadlines contained in the Court's "Order  
23 Setting initial Case Management Conference and ADR Deadlines" shall comport with the continued  
24 Case Management Conference date.

25 IT IS SO ORDERED.

26 3/2/12

27 Dated: \_\_\_\_\_, 2011

28 JUDGE \_\_\_\_\_



STIPULATION AND ORDER

CONFIRMING CMC