.abs, lı	nc. v. Roberts et al Do	c. 18
	Case3:12-cv-00171-JSW Document17 Filed05/21/12 Page1 of 3	
1 2 3 4 5 6 7	JAMES G. GATTO (<i>pro hac vice</i> to be submitted) james.gatto@pillsburylaw.com JENNA F. LEAVITT #213574 jenna.leavitt@pillsburylaw.com PILLSBURY WINTHROP SHAW PITTMAN LLP 725 South Figueroa Street, Suite 2800 Los Angeles, CA 90017-5406 Telephone: (213) 488-7100 Facsimile: (213) 629-1033 Attorneys for Plaintiff PLAYVISION LABS, INC.	
8	UNITED STATES DISTRICT COURT	
9	NORTHERN DISTRICT OF CALIFORNIA	
10		
11	Case No.: CV 12-0171 JSW	
12	PLAYVISION LABS, INC., a California corporation,) JOINT STIPULATION AND [PROPOSED]) ORDER TO STAY ACTION	
13	Plaintiff,) Civil L R 6-2 AND CONTINUING CASE	
14	vs.) CONFERENCE MANAGEMENT	
15	GREG ROBERTS, an individual; and SUZANNE ROBERTS, an individual,Judge: Hon. Jeffrey S. White	
16 17) Defendants.	
17		
19		
20)	
21	Pursuant to Civil L.R. 6-2, Plaintiff PlayVision Labs, Inc. ("PlayVision") and Defendant	
22	Suzanne Roberts ("Roberts") hereby stipulate and respectfully request that the Court Order as	
23	follows:	
24	WHEREAS, PlayVision and Roberts are currently in negotiations to settle the present	
25	dispute;	
26	WHEREAS, the parties estimate that it will take an additional 60 days to determine if	
27	settlement is possible;	
28		,
	CV 12-0171 JSW - 1 - JOINT STIPULATION AND <u>[PROPOSED]</u> ORDER TO STAY ACTION Dockets.Justia	

Case3:12-cv-00171-JSW Document17 Filed05/21/12 Page2 of 3

1	WHEREAS, the parties in good faith believe that staying the case will assist in their
2	ability to settle the matter between them without the need for further court intervention;
3	WHEREAS, on February 29, 2012, the Court set a Case Management Conference for
4	June 1, 2012, at 1:30 p.m., and also ordered the parties to file a joint case management statement
5	no later than five (5) court days prior to the Case Management Conference (on or by May 25,
6	2012);
7	WHEREAS, Plaintiff filed an Amended Complaint against All Defendants on March 16,
8	2012;
9	WHEREAS, Plaintiff's position is that Roberts has not yet responded to or answered the
10	Amended Complaint;
11	WHEREAS, the Court did not re-set the date for the Case Management Conference or the
12	due date for the joint case management statement after the Amended Complaint was filed;
13	WHEREAS, this is the first request to stay the case by the parties hereto;
14	WHEREAS, this request will not affect Defendant Gregory Roberts, who Plaintiff
15	contends was served last week;
16	WHEREAS, the requested stay will not affect the schedule for the case since one has not
17	yet been set;
18	WHEREAS, pursuant to Civil L.R. 6-2, the Declaration of Jenna F. Leavitt, counsel for
19	PlayVision, in support of the request is being filed contemporaneously herewith;
20	By her signature below, counsel for Plaintiff swears under penalty of perjury that
21	Defendant Suzanne Roberts concurred in the filing of this document.
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	CV 12-0171 JSW - 2 - JOINT STIPULATION AND [PROPOSED] ORDER TO STAY ACTION

	Case3:12-cv-00171-JSW Document17 Filed05/21/12 Page3 of 3
1	NOW, THEREFORE, the parties hereby stipulate to stay the above-referenced matter
2	until August 10, 2012 and to adjourn all dates set forth in the Court's Order Setting Case
3	Management Conference and Requiring Joint Case Management Conference Statement.
4	
5	Dated: May 21, 2012.
6	Respectfully submitted,
7	PILLSBURY WINTHROP SHAW PITTMAN LLP
8	
9	By <u>/s/ Jenna F. Leavitt</u> Jenna F. Leavitt
10	Attorneys for Plaintiff PLAYVISION LABS, INC.
11	
12	Dated: May 21, 2012. Respectfully submitted,
13	SUZANNE ROBERTS
14	
15	By <u>/s/ Suzanne Roberts</u>
16	Suzanne Roberts In Pro Per
17	PURSUANT TO STIPULATION, IT IS SO ORDERED.
18	The Court CONTINUES the case management conference to August 31, 2012, and the parties shall
19	submit a joint case management conference statement on August 24, 2012, unless the matter has been resolved before then.
20	Dated: May 22, 2012
21	Que ener
22	Hyportule Jewrey S. White
23	Thiten States District Court Judge
24	
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28	CV 12-0171 JSW
	- 3 - JOINT STIPULATION AND <u>[PROPOSED] O</u> RDER TO STAY ACTION