Case3:12-cv-00171-JSW Document21 Filed06/13/12 Page1 of 3

1 2 3 4 5 6 7 8 9 10 11	JAMES G. GATTO (pro hac vice 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. UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA
11 12 13 14 15 16 17 18	PLAYVISION LABS, INC., a California corporation, Plaintiff, Plaintiff, Vs. GREG ROBERTS, an individual; and SUZANNE ROBERTS, an individual, Defendants. Defendants. Case No.: CV 12-0171 JSW Case No.: CV 12-0171 JSW JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND THE BRIEFING SCHEDULE ON DEFENDANT GREG ROBERTS' MOTION TO DISMISS Civil L.R. 6-2 Judge: Hon. Jeffrey S. White
20 21 22 23 24 25 26	Pursuant to Civil L.R. 6-1(b), 6-2, and 7-12, Plaintiff PlayVision Labs, Inc. ("PlayVision") and Defendant Greg Roberts ("Roberts"), by and through their counsel, hereby submit this Joint Stipulation and [Proposed] Order to Extend the Briefing Schedule on Defendant Greg Roberts' Motion to Dismiss (the "Motion to Dismiss"), scheduled to be heard on July 13, 2012. Accordingly, the parties hereby stipulate and respectfully request that the Court Order as follows:
27	WHEREAS, PlayVision and Roberts are currently in negotiations to settle the present

dispute and have scheduled a telephonic settlement conference to take place on June 21, 2012; CV 12-0171 JSW JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND Dockets.Justia.com

Case3:12-cv-00171-JSW Document21 Filed06/13/12 Page2 of 3

1	WHEREAS, counsel for the parties met and conferred by telephone on June 12, 2012
2	regarding the deadlines for PlayVision's opposition to the Motion to Dismiss and subsequently
3	Roberts' reply;
4	WHEREAS, the parties stipulate, subject to the Court's approval, that PlayVision's time
5	to file an opposition to the Motion to Dismiss shall be extended to and including June 28, 2012;
6	WHEREAS, the parties further stipulate, subject to the Court's approval, that Roberts'
7	time to file a reply in support of his Motion to Dismiss shall be extended to and including July 5,
8	2012;
9	WHEREAS, the parties in good faith believe that this extension will assist in their ability
10	to settle the matter between them without the need for further court intervention;
11	WHEREAS, the requested extension to the briefing schedule will have no effect on the
12	Hearing on the Motion to Dismiss scheduled on July 13, 2012, or on the case schedule;
13	WHEREAS, this is the second request by the parties hereto to extend any deadlines in
14	this case, the first being an informal extension to Roberts' deadline for providing a response to
15	the Complaint (from May 23, 2012 to May 30, 2012);
16	WHEREAS, there has also been one prior extension with the other Defendant, Suzanne
17	Roberts, in which this Court granted the requested sixty (60) day stay with respect to the action
18	against Ms. Roberts;
19	WHEREAS, pursuant to Civil L.R. 6-2, the Declaration of Jenna F. Leavitt, counsel for
20	PlayVision, in support of the request is being filed contemporaneously herewith;
21	
22	NOW, THEREFORE, the parties hereby stipulate, subject to the Court's approval, that:
23	(1) PlayVision's time to file an opposition to the Motion to Dismiss shall be extended to and
24	including June 28, 2012, and (2) Roberts' time to file a reply in support of his Motion to Dismiss
25	shall be extended to and including July 5, 2012.
26	
27	
	i de la companya de

Case3:12-cv-00171-JSW Document21 Filed06/13/12 Page3 of 3

1	I, Jenna F. Leavitt, as the e-filing signatory, attest that concurrence in filing this document
2	has been obtained from Brian E. Mitchell.
3	Dated: June 13, 2012.
4	Respectfully submitted,
5	PILLSBURY WINTHROP SHAW PITTMAN LLP
6	By /s/ Jenna F. Leavitt
7	By <u>/s/ Jenna F. Leavitt</u> Jenna F. Leavitt Attorneys for Plaintiff PLAYVISION LABS, INC.
8	Dated: June 13, 2012.
9	Respectfully submitted,
10	MITCHELL + COMPANY
11	
12	By <u>/s/ Brian E. Mitchell</u> Brian E. Mitchell
13	Attorney for Defendant Greg Roberts
14	
15	PURSUANT TO STIPULATION, IT IS SO ORDERED.
16	Because the deadline to submit the reply brief is less than fourteen days before the hearing, the Court continues the hearing to July 20, 2012 at 9:00 a.m.
17	continues the hearing to sury 20, 2012 at 3.00 a.m.
18	Dated:June 13, 2012
19	Out live
20	Hovorgoe Jeffrey S. White
21	United States District Court Judge
22	
23	
24	
25	
26	
27	
28	