

1 ANDREW J. OGILVIE (SBN 57932)
 2 CAROL M. BREWER (SBN 214035)
 3 ANDERSON, OGILVIE & BREWER LLP
 4 235 Montgomery Street, Suite 914
 5 San Francisco, California 94104-3000
 6 Telephone: (415) 651-1952
 7 Facsimile: (415) 500-8300
 8 andy@aoblawyers.com
 9 carol@aoblawyers.com

10 JOHN SOUMILAS (Pro hac vice)
 11 FRANCIS & MAILMAN, P.C.
 12 Land Title Building, 19th Floor
 13 100 South Broad Street
 14 Philadelphia, PA 19110
 15 Telephone: (215) 735-8600

Attorneys for Plaintiff, Sergio L. Ramirez

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA

18 SERGIO L. RAMIREZ, on behalf of
19 himself and all others similarly situated,

20 Plaintiff,

21 v.

22 TRANS UNION, LLC,

23 Defendant.

Case No. CV- 12-00632-JSC

STIPULATION AND ~~PROPOSED~~
 ORDER AMENDING SCHEDULE
 FOR BRIEFING AND HEARING ON
 PENDING MOTIONS

24 WHEREAS, on January 9, 2013, defendant Trans Union, LLC (Trans Union)
 25 filed its motions to disqualify opposing counsel and to dismiss for lack of
 26 jurisdiction (Dkt 51 and 52) and plaintiff filed his motion for interim appointment
 27 of counsel (Dkt 50), hereinafter referred to as “the pending motions;”

1 WHEREAS pursuant to the local rules and the Court's prior scheduling
2 order, the pending motions currently are scheduled for responsive papers to be filed
3 by January 23, 2013, replies to be filed by January 30, 2013 and hearings on
4 February 28, 2013;
5

6 WHEREAS, to allow the parties sufficient time to prepare their responses and
7 replies and because Plaintiff's counsel has a court hearing in another matter on the
8 East Coast on February 28, 2013 and would be unable to attend both that hearing and
9 the hearings on the pending motions under the current schedule;
10

11 WHEREAS, pursuant to Local Rules 6-1(b) and 6-2, the parties may request an
12 order changing time that would affect the date of an event or deadline already fixed by
13 Court order;
14

15 WHEREAS this Stipulation is made in good faith and not for the purpose of
16 delay;
17

18 IT IS HEREBY STIPULATED, by and between the parties, through their
19 respective counsel of record, that:
20

21 1. The date for filing responses to the pending motions is continued from
22 January 23, 2013 to February 6, 2013;

23 2. The date for replies in support of the pending motions is continued from
24 January 30, 2013 to February 20, 2013;

25 3. The hearing date for the pending motions is continued from February
26 28, 2013 to March 14, 2013 at 9:00 AM in Courtroom F, 15th Floor, Federal Building,
27

1 450 Golden Gate Avenue, San Francisco, California.

2 IT IS SO STIPULATED.

3 Dated: January 15, 2013 ANDERSON, OGILVIE & BREWER LLP
4 and
5 FRANCIS & MAILMAN, P.C.

6 By /s/ Andrew J. Ogilvie
7 Andrew J. Ogilvie
8 Attorney for Plaintiff SERGIO L. RAMIREZ

9 Dated: January 15, 2013 STROOCK & STROOCK & LAVAN LLP

10 By /s/ Jeffrey B. Bell
11 Jeffrey B. Bell
12 Attorneys for Defendant, TRANS UNION LLC

13 **~~PROPOSED~~ ORDER**

14 Pursuant to stipulation, it is **ORDERED** that:

15
16 1. The date for filing responses to Trans Union’s motions to disqualify
17 counsel and to dismiss and plaintiff’s motion for appointment as interim counsel (“the
18 pending motions”) is continued from January 23, 2013 to February 6, 2013;

19
20 2. The date for filing replies in support of the pending motions is
21 continued from January 30, 2013 to February 20, 2013;

22 3. The hearing date for the pending motions is continued from February
23 28, 2013 to March 13, 2013 at 9:00 a.m..

24 Dated: January 16, 2013

