

1 Counsel listed on the following page.

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT
SAN FRANCISCO DIVISION

PETER WRIGHT and MICHELLE TRAME, individually, on behalf of all others similarly situated, and on behalf of the general public,

Plaintiffs,

vs.

ADVENTURES ROLLING CROSS COUNTRY, INC., dba ADVENTURES CROSS COUNTRY (ARCC), a California Corporation, SCOTT VON ESCHEN, and DOES 1 through 50 inclusive,

Defendants.

Case No. 3:12-cv-00982-EMC

STIPULATION TO CONTINUE DEADLINE FOR JOINT SUPPLEMENTAL BRIEF

Judge: Edward M. Chen
Ctrm: 5, 17th Floor

Current Deadline: July 15, 2013
Proposed Deadline: July 22, 2013

1 REED E. SCHAPER (SBN 082792)
HIRSCHFELD KRAEMER LLP
2 233 Wilshire Boulevard, Suite 600
Santa Monica, CA 90401
3 Telephone: (310) 255-0705
Facsimile: (310) 255-0986
4 Email: rschaper@hkemploymentlaw.com

5 KRISTIN L. OLIVEIRA (SBN 204384)
HIRSCHFELD KRAEMER LLP
6 505 Montgomery Street, 13th Floor
San Francisco, CA 94111
7 Telephone: (415) 835-9000
Facsimile: (415) 834-0443
8 Email: koliveira@hkemploymentlaw.com

9 Attorneys for Defendants
ADVENTURES ROLLING CROSS COUNTRY, INC.,
10 dba ADVENTURES CROSS COUNTRY (ARCC) and
SCOTT VON ESCHEN
11

12 BRYAN SCHWARTZ LAW
BRYAN SCHWARTZ (SBN 209903)
13 MICHAEL THOMAS (SBN 226129)
1330 Broadway, Suite 1630
14 Oakland, CA 94612
Telephone: (510) 444-9300
15 Facsimile: (510) 444-9301
Email: bryan@bryanschwartzlaw.com
16 Email: michael@bryanschwartzlaw.com

17 RUDY, EXELROD, ZIEFF & LOWE, L.L.P.
DAVID A. LOWE (SBN 178811)
18 JOHN T. MULLAN (SBN 221149)
351 California Street, Suite 700
19 San Francisco, CA 94104
Telephone: (415) 434-9800
20 Facsimile: (415) 434-0513
Email: dal@rezlaw.com
21 Email: jtm@rezlaw.com

22 Attorneys for Plaintiffs
23
24
25
26
27
28

1 TO THE COURT:

2 Plaintiffs PETER WRIGHT and MICHELLE TRAME (“Plaintiffs”) and Defendants
3 ADVENTURES ROLLING CROSS COUNTRY, INC., and SCOTT VON ESCHEN
4 (“Defendants”), by and through their respective counsel of record, herein agree and stipulate as
5 follows:

6 **RECITALS**

7 1. The Court has required that the parties meet and confer and file a joint
8 supplemental brief regarding the proposed class notice and consent form by July 15, 2013 (ECF
9 Doc. 134);

10 2. The parties are actively engaged in settlement discussions on issues that impact the
11 contents of the joint supplemental brief;

12 3. The parties respectfully request more time to meet and confer on the issues raised
13 by the Court in its Order dated July 8, 2013;

14
15 **STIPULATION**

16 NOW, THEREFORE, based upon the foregoing statements, Plaintiffs and Defendants
17 hereby agree and stipulate as follows, subject to Court approval, that the deadline to file a joint
18 supplemental brief regarding the proposed class notice and consent form be continued to **July 22,**
19 **2013.**

20 IT IS SO STIPULATED:
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: July 12, 2013

HIRSCHFELD KRAEMER LLP

By: /s/ Kristin L. Oliveira
Reed E. Schaper
Kristin L. Oliveira
Attorneys for Defendants
ADVENTURES ROLLING CROSS
COUNTRY, INC., dba ADVENTURES
CROSS COUNTRY (ARCC) and SCOTT
VON ESCHEN

Dated: July 12, 2013

BRYAN SCHWARTZ LAW
RUDY EXELROD ZIEFF & LOWE, LLP

By: /s/ Bryan J. Schwartz
Bryan J. Schwartz
Attorneys for Plaintiffs
PETER WRIGHT and MICHELLE TRAME

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

~~[PROPOSED]~~ ORDER

Pursuant to the parties' Joint Stipulation, it is so ordered that the deadline for the Parties to file a joint supplemental brief regarding the proposed class notice and consent form be extended to ~~July 22, 2013~~ July 19, 2013 by 4:00 p.m.

Dated: July 15, 2013

