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 2 Mark J. Polland, Esq., State Bar No. 210657
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10 Attorneys for LARRY JAMES;
 11 DAVID R. BATTON; ANDRE DOUZDJIAN;
 12 BATTON TECHNICAL ENGINEERING
 13 CONSULTANTS, INC.; BATTON, INC.;
 14 HANBON -- CARO I, LLC; HANBON --
 15 MI I, LLC; HANBON MI II, INC.; HANBON --
 16 MARLETTE, LLC; HANBON -- PA I, LLC;
 17 TEC GROUP, INC.; DEPLOY HR, INC.;
 18 DEPLOYHR, INC.

19 IN THE UNITED STATES DISCTRICT COURT
 20 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 21 SAN FRANCISCO DIVISION

22 CORNERSTONE STAFFING SOLUTIONS, INC.,
 23 a California Corporation,

24 Plaintiff,

25 vs.

26 LARRY THAXTER JAMES an individual; DAVID
 27 R. BATTON, an individual; TED MANNELLO, an
 28 individual; ANDRE DOUZDJIAN, an individual;
 MICHAEL SANTOS, an individual; MARCOS
 BARRERA, an individual; BATTON TECHNICAL
 ENGINEERING CONSULTANTS, INC., a
 Michigan corporation; BATTON DIVERSIFIED
 STAFFING SOLUTIONS, a Michigan corporation;
 HANBON-CARO I, LLC, a Michigan limited
 liability company a/k/a CARO I, LLC; HANBON --
 MI I, LLC, a Michigan limited liability company
 d/b/a TECHNICAL ENGINEERING
 CONSULTANTS; HANBON - MI II, INC., a
 Michigan corporation d/b/a BATTON TECHNICAL
 ENGINEERING CONSULTANTS; HANBON --
 MARLETTE, LLC, a Michigan limited liability
 company; HANBON - PA I, LLC a Pennsylvania
 limited liability company; HANBON - CT I, LLC a

Case No.: 3:12-cv-01527-RS

Assigned to Hon. Richard Seeborg

**STIPULATION TO ADVANCE THE
 DATE FOR THE HEARING ON THE
 NEXT CASE MANAGEMENT
 CONFERENCE AND [PROPOSED]
 ORDER**

Complaint Filed: March 27, 2012
 Trial Date: October 28, 2013

1 Connecticut limited liability company; TEC GROUP
2 INC., a Michigan corporation d/b/a TEC GROUP
3 ALSO d/b/a TEC-CHRYSLER; DEPLOY HR,
4 INC., a Pennsylvania corporation d/b/a DEPLOY
5 HR STAFFING, INC.; DEPLOYHR, INC., a
6 California corporation d/b/a TEC ALSO d/b/a
7 BATTON; and DOES 1- 100,

8 Defendants.

9 **STIPULATION**

10 The parties signing below acknowledge the following:

11 1. The Court recently ordered a continuance of the date for the hearing on
12 Defendants' motions to dismiss CornerStone Staffing Solutions, Inc.'s ("CornerStone") First
13 Amended Complaint ("FAC") in the above-entitled matter from November 15, 2012 to December
14 13, 2012, at 1:30 p.m. In addition, the Court ordered all parties to appear in person for that
15 hearing.

16 2. The current date for the next Case Management Conference ("CMC") in this matter
17 is set for December 20, 2012. The CMC was set for that date in order to allow time for the
18 Settlement Conference among the parties to be completed prior to the CMC.

19 3. The Settlement Conference is scheduled with the Honorable Magistrate Vadas in
20 San Francisco for November 30, 2012.

21 ///

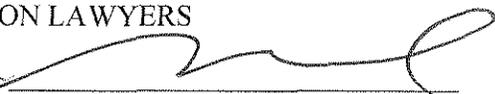
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23 ///

1 Based on the foregoing, the parties signing below stipulate and respectfully request the
2 Court to advance the CMC from December 20, 2012, to December 13, 2012, at 1:30 p.m. to
3 consolidate the CMC on the same date as the hearing on the motions to dismiss and avoid another
4 hearing on the following week. Because the Settlement Conference will proceed on November 30,
5 it will be completed well in advance of the December 13 hearing date.

6 **IT IS SO STIPULATED.**

7
8 Dated: 11.8.12

MARRON LAWYERS
Signed: 
PAUL MARRON
MARK POLLAND
Attorneys for Defendants LARRY JAMES; DAVID
R. BATTON; ANDRE DOUZDJIAN; BATTON
TECHNICAL ENGINEERING CONSULTANTS,
INC.; BATTON, INC.; HANBON -- CARO I, LLC;
HANBON -- MI I, LLC; HANBON MI II, INC.;
HANBON -- MARLETTE, LLC; HANBON -- PA
I, LLC; TEC GROUP, INC.; DEPLOY HR, INC.;
DEPLOYHR, INC.

14
15
16 Dated: _____

WOODS LAW GROUP
Signed: _____
BRINY WOODS
Attorneys for Defendant MICHAEL SANTOS and
HANBON - CT I, LLC

19
20
21 Dated: _____

BURKHARDT & LARSON
Signed: _____
PHILIP BURKHARDT
Attorneys for Defendant MARCOS BARRERA

22
23
24 Dated: _____

HILL, FARRER & BURRILL LLP
Signed: _____
NEIL MARTIN
CLAYTON HIX
Attorneys for Plaintiff CORNERSTONE
STAFFING SOLUTIONS, INC. and Counter-
Defendant MARY ANDERSON

25
26
27
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Signed: _____

9 PAUL MARRON
10 MARK POLLAND
11 Attorneys for Defendants LARRY JAMES; DAVID
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17 I, LLC; TEC GROUP, INC.; DEPLOY HR, INC.;
18 DEPLOYHR, INC.

19 WOODS LAW GROUP

20 Dated: 11/8/12

21 Signed:  _____

22 BRINY WOODS
23 Attorneys for Defendant MICHAEL SANTOS and
24 HANBON - CT I, LLC

25 BURKHARDT & LARSON

26 Dated: _____

27 Signed: _____

28 PHILIP BURKHARDT
Attorneys for Defendant MARCOS BARRERA

HILL, FARRER & BURRILL LLP

Dated: _____

Signed: _____

NEIL MARTIN
CLAYTON HIX
Attorneys for Plaintiff CORNERSTONE
STAFFING SOLUTIONS, INC. and Counter-
Defendant MARY ANDERSON

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10 MARK POLLAND
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14 WOODS LAW GROUP

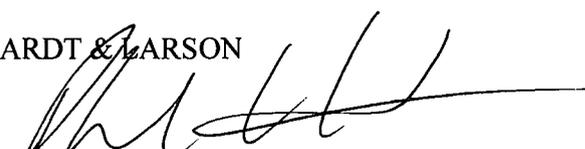
16 Dated: _____

Signed: _____

17 BRINY WOODS
18 Attorneys for Defendant MICHAEL SANTOS and
19 HANBON -- CT I, LLC

19 BURKHARDT & LARSON

20 Dated: 11/8/12

Signed:  _____

21 PHILIP BURKHARDT
22 Attorneys for Defendant MARCOS BARRERA

23 HILL, FARRER & BURRILL LLP

24 Dated: _____

Signed: _____

25 NEIL MARTIN
26 CLAYTON HIX
27 Attorneys for Plaintiff CORNERSTONE
28 STAFFING SOLUTIONS, INC. and Counter-
Defendant MARY ANDERSON

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17 I, LLC; TEC GROUP, INC.; DEPLOY HR, INC.;
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19 WOODS LAW GROUP

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Signed: _____

21 BRINY WOODS
22 Attorneys for Defendant MICHAEL SANTOS and
23 HANBON - CT I, LLC

24 BURKHARDT & LARSON

25 Dated: _____

Signed: _____

26 PHILIP BURKHARDT
27 Attorneys for Defendant MARCOS BARRERA

28 HILL, FARRER & BURRILL LLP

Dated: 11/8/12

Signed: 

NEIL MARTIN
CLAYTON HIX
Attorneys for Plaintiff CORNERSTONE
STAFFING SOLUTIONS, INC. and Counter-
Defendant MARY ANDERSON

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[PROPOSED] ORDER

Pursuant to the foregoing stipulation, the Court orders that the date for the Case Management Conference in the above-entitled matter is advanced from December 20, 2012 to December 13, 2012 at 1:30 p.m. The December 20, 2012 date is vacated.

IT IS SO ORDERED.

Date: 11/9/12



The Honorable Richard Seeborg
Judge of the United States District Court