

GAUNTLETT & ASSOCIATES

David A. Gauntlett (SBN 96399)
James A. Lowe (SBN 214383)
Andrew M. Sussman (SBN 112418)
18400 Von Karman, Suite 300
Irvine, California 92612
Telephone: (949) 553-1010
Facsimile: (949) 553-2050
jal@gauntlettlaw.com
ams@gauntlettlaw.com

Attorneys for Plaintiffs Lopez Tax Service, Inc.,
Carlos C. Lopez, Kristeena S. Lopez, and Latino
Tax Professionals Association, LLC

Nicholas Ranallo (SBN 275016)
Attorney at Law
371 Dogwood Way
Boulder Creek, California 95006
Telephone: (831) 703-4011
Facsimile: (831)-533-5073
nick@ranallolawoffice.com

Christopher E. Gatewood [*Pro Hac Vice*]
THRESHOLD COUNSEL, PC
1905 Huguenot Road, Suite 200
Richmond, Virginia 23235
Telephone: (804) 677-0947
Facsimile: (804) 482-2641
chris@thresholdcounsel.com

Attorneys for Defendant The Income Tax School

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

LOPEZ TAX SERVICE, INC., et al.,

Plaintiffs,

vs.

THE INCOME TAX SCHOOL, INC.,

Defendant.

) Case No.: CV12-02654-JSW

)
)
) **STIPULATION AND [PROPOSED]**
) **ORDER TO EXTEND EARLY NEUTRAL**
) **EVALUATION DEADLINE**

) [Civ. L.R. 7-12]
)
)
)

1 Pursuant to Civ. L.R. 7-12, Plaintiffs LOPEZ TAX SERVICE, INC., CARLOS C. LOPEZ,
2 KRISTEENA S. LOPEZ and LATINO TAX PROFESSIONALS ASSOCIATION, LLC,
3 (collectively “Lopez”) and Defendant THE INCOME TAX SCHOOL, INC. (“ITS”) hereby stipulate
4 and agree to request an extended deadline to complete Early Neutral Evaluation in this case. This
5 stipulation is based on the following:

6 1) Per local rules, the Court originally ordered the Parties to complete the ENE within
7 90 days of October 31, 2012, or January 29, 2013.

8 2) In their November 27, 2012 initial conference call with William Fenwick, the
9 appointed Evaluator, the Parties and Evaluator agreed that it may be reasonable and necessary to
10 extend the ENE deadlines. The parties believe that the ENE will be more effective after each has
11 had the opportunity to conduct their respective depositions. The Lopez parties are scheduled to
12 depose individuals associated with ITS on December 10-12, 2012. ITS has likewise scheduled
13 depositions of the Lopez parties for January 7-9, 2013.

14 3) The Parties, their counsel, and the Evaluator are available and have agreed to hold the
15 ENE on January 29, 2013.

16 4) The parties seek to extend the ENE deadline to March 1, 2013, to allow the parties
17 sufficient time to conduct a meaningful evaluation on January 29th and to allow for a potential
18 follow-up session, if necessary.

19
20
21
22 Dated: December 4, 2012

GAUNTLETT & ASSOCIATES

By: /s/ Andrew M. Sussman

David A. Gauntlett
James A. Lowe
Andrew M. Sussman

Attorneys for Plaintiffs
Lopez Tax Service, Inc., Carlos C. Lopez,
Kristeena S. Lopez, and Latino Tax Professionals
Association, LLC

1 Dated: December 4, 2012

Nicholas Ranallo, Attorney at Law

2 By: /s/ Nicholas Ranallo

3 Nicholas Ranallo
371 Dogwood Way
Boulder Creek, CA 95006

4 Christopher E. Gatewood [*Pro Hac Vice*]
5 THRESHOLD COUNSEL, PC
1905 Huguenot Road, Suite 200
6 Richmond, VA 23235
Telephone: (804) 677-0947
7 Facsimile: (804) 482-2641
chris@thresholdcounsel.com

8 Attorneys for Defendant
9 The Income Tax School, Inc.

10
11
12 PURSUANT TO STIPULATION, IT IS SO ORDERED.

13
14 Dated: December 5, 2012

15 
16 UNITED STATES DISTRICT JUDGE