

**GAROFOLLO LAW GROUP, P.C.**

Joseph A. Garofolo, California Bar No. 214614

E-mail: jgarofolo@garofololaw.com

90 New Montgomery Street, Suite 905

San Francisco, CA 94105

Telephone: (415) 981-8500

Facsimile: (415) 981-8870

Attorneys for Plaintiffs

CIRCLE CLICK MEDIA LLC, METRO  
TALENT, LLC, and CTNY INSURANCE  
GROUP LLC**BRYAN CAVE LLP**

K. Lee Marshall, California Bar No. 277092

Meryl Macklin, California Bar No. 115053

Daniel Thomas Rockey, California Bar No. 178604

560 Mission Street, 25<sup>th</sup> Floor

San Francisco, CA 94105

Telephone: (415) 675-3400

Facsimile: (415) 675-3434

Email: klmarshall@bryancave.com

meryl.macklin@bryancave.com

daniel.rockey@bryancave.com

Attorneys for Defendants

REGUS MANAGEMENT GROUP, LLC, REGUS  
BUSINESS CENTRE, LLC, REGUS plc, and HQ  
GLOBAL WORKPLACES LLC**UNITED STATES DISTRICT COURT****NORTHERN DISTRICT OF CALIFORNIA**

CIRCLE CLICK MEDIA LLC, et al.,

Plaintiffs,

vs.

REGUS MANAGEMENT GROUP, LLC,  
et al.,

Defendants.

Case No. 3:12-CV-04000 SC

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO ENLARGE TIME TO  
ANSWER OR OTHERWISE RESPOND  
TO DEFENDANTS' COUNTERCLAIMS  
AND TO CONTINUE CASE  
MANAGEMENT CONFERENCE**

STIPULATION AND [PROPOSED] ORDER

Case No. 3:12-CV-04000 SC

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14           Plaintiffs filed their Second Amended Complaint (Doc. 65) on February 11, 2013, alleging  
15           a putative class action. After Defendants filed a motion to dismiss (Doc. 69), which the Court  
16           granted in part and denied in part pursuant to its Order dated April 22, 2013 (Doc. 77), Defendants  
17           timely filed their Answer, Affirmative Defenses, and Counterclaims (Doc. 78) on May 6, 2013.  
18           Absent an extension, an answer or other response would be due on May 28, 2013. (*See*  
19           Declaration of Joseph A. Garofolo ¶ 3 filed concurrently herewith). Plaintiffs currently intend to  
20           file motions to dismiss in response to some or all of the Counterclaims. (*Id.*).

25 Accordingly, the parties have stipulated to the extended briefing schedule set forth above.  
26 The parties also believe that judicial economy may be achieved by continuing the Case  
27 Management Conference currently set for June 21, 2013, to September 13, 2013, which would be  
28 after the requested hearing on Plaintiffs' Motions to Dismiss, and Plaintiffs' counsel has a

1 scheduling conflict with travel to and attendance at a wedding in which he is involved on the date  
2 currently set for the Case Management Conference of June 21, 2013. (*See id.* at ¶ 5). Plaintiffs  
3 request that they be permitted to file an updated joint Case Management Statement by September  
4 6, 2013 (seven days prior to the requested date for the continued Case Management Conference).

5 Plaintiffs' counsel has confirmed with the Court that August 9, 2013, at 10:00 A.M., is  
6 currently available for the Court to hear Plaintiffs' Motions to Dismiss and September 13, 2013, at  
7 10:00 A.M., is available for a Case Management Conference. (*See id.* at ¶ 6).

8 This is the first request for an enlargement of the time for Plaintiffs to answer or otherwise  
9 respond to the Counterclaims and the briefing schedule relating to the Motions to Dismiss, and the  
10 second request for a continuance of the Case Management Conference. (*Id.* at ¶ 7).

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1 The parties do not believe that the requested continuance will have any effect on the  
2 overall schedule for this case. (*Id.* at ¶ 8).

3 IT IS SO STIPULATED.

4 Dated: May 15, 2013

**GAROFOLLO LAW GROUP, P.C.**

6 By: /s/ Joseph A. Garofolo

Joseph A. Garofolo

Attorneys for Plaintiffs

7 CIRCLE CLICK MEDIA LLC, METRO TALENT,  
8 LLC, and CTNY INSURANCE GROUP LLC

9 **BRYAN CAVE LLP**

10 By: [Signature]

11 Stephanie A. Blazewicz

Attorneys for Defendants

12 REGUS MANAGEMENT GROUP, LLC, REGUS  
13 BUSINESS CENTRE, LLC, REGUS plc, and HQ  
14 GLOBAL WORKPLACES LLC

15 **ORDER**

16 Pursuant to the Stipulation, and good cause appearing, the Court orders the following:

17 i) Plaintiffs may respond to Defendant's Counterclaims by June 24, 2013, by filing an answer or  
18 motions to dismiss noticed for August 9, 2013, at 10:00 A.M.; ii) Defendant's oppositions thereto  
19 are due by July 15, 2013; and iii) Plaintiffs' replies to Defendant's oppositions are due by July 26,  
20 2013.

21 The Court further orders that the Case Management Conference currently set for June 21,  
22 2013, is continued to September 13, 2013, at 10:00 A.M. The parties shall file an updated joint  
23 Case Management Statement no later than September 6, 2013.

24 IT IS SO ORDERED.

25  
26 Dated: May 21, 2013

27 UNITED STATES

