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16	GLOBAL WORKPLACES LLC		
17	UNITED STATES DISTRICT COURT		
18 19	NORTHERN DISTRICT OF CALIFORNIA		
20			
21	CIRCLE CLICK MEDIA LLC, et al., Plaintiffs,	Case No. 3:12-CV-04000 SC	
22	VS.	STIPULATION AND [PROPOSED] ORDER TO ENLARGE TIME TO	
23	REGUS MANAGEMENT GROUP, LLC,	ANSWER OR OTHERWISE RESPOND TO DEFENDANTS' COUNTERCLAIMS AND TO CONTINUE CASE MANAGEMENT CONFERENCE	
24	et al.,		
25	Defendants.		
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	STIPULATION AND [PROPOSED] ORDER Case No. 3:12-CV-04000 SC		
		Dockets.Ju:	

1	STIPULATION
2	Pursuant to Civil L.R. 6-2, 7-12, and 16-12, Plaintiffs Circle Click Media LLC, Metro
3	Talent, LLC, and CTNY Insurance Group LLC (collectively, "Plaintiffs") and Defendants Regus
4	Management Group, LLC, Regus Business Centre, LLC, Regus plc, and HQ Global Workplaces
5	LLC (collectively, "Defendants") hereby stipulate and request that the time for Plaintiffs to answer
6	or otherwise respond to the Counterclaims (Doc. 78) of Regus Management Group, LLC ("RMG")
7	be enlarged until, and including, June 24, 2013. The parties also stipulate and request that the
8	following briefing schedule be established for any motions to dismiss ("Motions to Dismiss") that
9	Plaintiffs intend to file by June 24, 2013: i) Defendant RMG's oppositions thereto be due by, and
10	including, July 15, 2013; and ii) Plaintiffs' replies to Defendant's oppositions be due by, and
11	including, July 26, 2013. The parties further stipulate and request that the Plaintiffs may notice
12	their Motions to Dismiss for August 9, 2013, at 10:00 A.M., and that the Case Management
13	Conference, currently set for June 21, 2013, be continued to September 13, 2013, at 10:00 A.M.
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.).
21	Plaintiffs' lead counsel's wife is expecting the birth of their third child (a second
22	daughter) with a due date on May 20, 2013, and Plaintiffs' lead counsel wishes to reduce some of
23	the burden of his litigation schedule surrounding his wife's due date to spend time with his family
24	and new daughter. (See id. at \P 4).
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
	STIPULATION AND [PROPOSED] ORDER

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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 \P 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 \P 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. (<i>Id.</i> at \P 8).	
3	IT IS SO STIPULATED.	
4	Dated: May 15, 2013 GAROFOLO LAW GROUP, P.C.	
5		
6	By: <u>/s/ Joseph A. Garofolo</u> Joseph A. Garofolo	
7 8	Attorneys for Plaintiffs CIRCLE CLICK MEDIA LLC, METRO TALENT, LLC, and CTNY INSURANCE GROUP LLC	
9	BRYAN CAVE LLP	
10	By: AAAA	
11	Stephanie A. Blazewicz Attorneys for Defendants	
12	REGUS MANAGEMENT GROUP, LLC, REGUS BUSINESS CENTRE, LLC, REGUS plc, and HQ	
13	GLOBAL WORKPLACES LLC	
14		
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	EL LANG	
26	Dated: May 21, 2013	
27	UNITED STATE Judge Samuel Conti	
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	Case No. 3:12-CV-04000 SC	