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UNITED STATES DISTRICT COURT**NORTHERN DISTRICT OF CALIFORNIA**

CIRCLE CLICK MEDIA LLC, a California
 limited liability company; METRO
 TALENT, LLC, a California limited
 liability company; and CTNY
 INSURANCE GROUP LLC, a Connecticut
 limited liability company, on behalf of
 themselves and others similarly situated,

Plaintiffs,

vs.

REGUS MANAGEMENT GROUP, LLC, a
 Delaware limited liability company;
 REGUS BUSINESS CENTRE LLC, a
 Delaware limited liability company;
 REGUS PLC, a Jersey, Channel Islands,
 public limited company; HQ GLOBAL

Case No. 3:12-CV-04000 SC

**STIPULATION AND ~~[PROPOSED]~~ ORDER
 TO CONTINUE CASE MANAGEMENT
 CONFERENCE**

1 WORKPLACES LLC, a Delaware limited
liability company; and DOES 1-50,
2 Defendants.
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5 **STIPULATION**

6 Pursuant to Civil L.R. 6-2, 7-12, and 16-10, Plaintiffs Circle Click Media LLC, Metro
7 Talent, LLC, and CTNY Insurance Group LLC (collectively, "Plaintiffs") and Defendants Regus
8 Management Group, LLC, Regus Business Centre, LLC, Regus plc, and HQ Global Workplaces
9 LLC (collectively, "Defendants") hereby stipulate and request that the Case Management
10 Conference, currently set for September 13, 2013, be continued to December 13, 2013, at 10:00
11 A.M.

12 Defendants requested that Plaintiffs stipulate to continue the Case Management
13 Conference and Defendants seek relief from Civil L.R. 6-1(b) in bringing this stipulated request
14 eight days before the September 13, 2013 Case Management Conference. (*Id.* at ¶ 4).

15 Defendants filed their Counterclaims (Doc. 78) on May 6, 2013. Plaintiffs filed motions
16 to dismiss (Docs. 81 and 82), which the Court granted in part and denied in part pursuant to its
17 Order dated August 13, 2013 (Doc. 90). Defendants' First Amended Counterclaims are due on
18 September 12, 2013. Plaintiffs' answer or other response would be due on September 26, 2013;
19 however, the parties stipulate and request that Plaintiffs' answer or other response be due on
20 October 3, 2013. (*See* Declaration of Stephanie A. Blazewicz ¶ 3 filed concurrently herewith).
21 Plaintiffs currently intend to file one or more Fed. R. Civ. P. 12 motions in response to some or all
22 of the First Amended Counterclaims. (*Id.*).

23 The parties believe that judicial economy may be achieved by continuing the Case
24 Management Conference currently set for September 13, 2013 to December 13, 2013, which
25 would allow time for Plaintiffs to file and the Court to hear any motion to dismiss the Amended
26 Counterclaims. (*See id.* at ¶ 5). The parties request that they be permitted to file an updated joint
27 Case Management Statement by December 6, 2013 (seven days prior to the requested date for the
28

1 continued Case Management Conference).

2 Defendants' counsel has confirmed with the Court that December 13, 2013, at 10:00
3 A.M., is available for a Case Management Conference. (*See id.* at ¶ 6).

4 This is the third request for a continuance of the Case Management Conference. (*Id.* at ¶
5 7). The parties do not believe that the requested continuance will have any effect on the overall
6 schedule for this case. (*Id.* at ¶ 8).

7 IT IS SO STIPULATED.

8 Dated: September 5, 2013

BRYAN CAVE LLP

9
10 By: /s/ Stephanie A. Blazewicz
Stephanie A. Blazewicz
11 Attorneys for Defendants
REGUS MANAGEMENT GROUP, LLC, REGUS
12 BUSINESS CENTRE, LLC, REGUS plc, and HQ
GLOBAL WORKPLACES LLC

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14 **GAROFOLO LAW GROUP, P.C.**

15 By: /s/ Joseph A. Garofolo
16 Joseph A. Garofolo
Attorneys for Plaintiffs
17 CIRCLE CLICK MEDIA LLC, METRO TALENT,
18 LLC, and CTNY INSURANCE GROUP LLC

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~~PROPOSED~~ ORDER

Pursuant to the Stipulation, and good cause appearing, the Court orders that the Case Management Conference currently set for September 13, 2013, is continued to December 13, 2013, at 10:00 A.M. The parties shall file an updated joint Case Management Statement no later than December 6, 2013.

The Court further orders that Plaintiffs may file an answer or other response on or before October 3, 2013.

IT IS SO ORDERED.

Dated: September 10, 2013

