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16 [Additional counsel included in signature block.]

17 Attorneys for Plaintiffs and the Putative Class

18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA  
20 SAN FRANCISCO DIVISION

21 BENSON WORLEY, et al.

22 Plaintiff,

23 v.

24 AVANQUEST NORTH AMERICA INC.,

25 Defendant.

CASE NO. 3:12-CV-04391-WHO

**STIPULATED REQUEST FOR ORDER  
CONTINUING FURTHER CASE  
MANAGEMENT CONFERENCE; AND  
ORDER**

Date: February 11, 2014  
Time: 2:00 p.m.  
Judge: Hon. William H. Orrick  
26 Ctrm.: 2 (17<sup>th</sup> Floor)

1 Pursuant to Local Rules 6-1, 6-2, 7-12, plaintiffs Benson Worley and Johnny Boyd  
2 (“Plaintiffs”) and defendant, Avanquest North America Inc. (“Avanquest”) (“collectively,  
3 “Parties”), by and through their undersigned counsel, submit this Stipulated Request for Order  
4 Continuing Further Case Management Conference; and [proposed] Order.

5 WHEREAS, the Parties previously stipulated to extend the time of Initial Case  
6 Management Conference and it was held on October 1, 2013 (Doc Nos. 26; 51; 67; 86);

7 WHEREAS, by Order entered October 1, 2013, the Court set a Further Case Management  
8 Conference for February 11, 2014 at 2:00 p.m. (Dkt. No. 110);

9 WHEREAS, on November 14, 2013, the Parties presented the Court with a Joint  
10 Statement Regarding Discovery Disputes (Dkt. No. 116);

11 WHEREAS, on November 19, 2013, the Court issued an Order referring this case to a  
12 magistrate judge for discovery purposes, including consideration of the Parties’ Joint Statement  
13 Regarding Discovery Disputes, and thereafter the case was assigned to Magistrate Judge Laurel  
14 Beeler on November 21, 2013 (Dkt. Nos. 117; 118);

15 WHEREAS, on December 12, 2013, the Parties presented oral argument at the hearing on  
16 their Joint Statement Regarding Discovery Disputes and Judge Beeler issued a ruling on the same  
17 on December 13, 2013 (Dkt. No. 123);

18 WHEREAS, the Parties have been proceeding with discovery in light of Judge Beeler’s  
19 December 13th Order (and otherwise), including engaging in an ongoing meet and confer process  
20 to address various issues related to their respective discovery responses and productions of  
21 documents and tangible things in light of the Court’s ruling on the Joint Statement Regarding  
22 Discovery Disputes;

23 WHEREAS, the Parties believe good cause exists and that it is in the Court and their best  
24 interest to continue the scheduled Further Case Management Conference from February 11, 2014,  
25 to March 18, 2014, or such other date convenient for the Court, to allow the Parties time to  
26 complete the meet and confer process, at which point they will be able to better inform the Court  
27 as to the status of ongoing discovery and related issues;

28 WHEREAS, Local Rule 6-1(b) mandates that the Parties may stipulate in writing to the

1 Court “for any enlargement . . . of time that alters an event or deadline already fixed by Court  
2 order.” Local Rule 6-1(b);

3 WHEREAS, the Parties are not aware of any date fixed by Court order that will be altered  
4 by the instant stipulation, absent the Court’s execution of this Proposed Order (which would  
5 modify the deadline to file a Joint Case Management Statement and the Further Case  
6 Management Conference);

7 WHEREAS, good cause exists to grant the Parties’ Stipulated Request.

8 **NOW THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE:**

9 1. The Further Case Management Conference shall be continued from February 11,  
10 2014 at 2:00 p.m. to March 18, 2014 at 2:00 p.m., or such other date and time that is convenient  
11 for the Court.

12 **IT IS SO STIPULATED.**

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Dated: February 4, 2014

**BENSON WORLEY and JOHNNY BOYD,**  
individually and on behalf of all others similarly situated,

By: /s/ Benjamin H. Richman  
One of Plaintiffs' Attorneys

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Dated: February 4, 2014

**AVANQUEST NORTH AMERICA INC.,**

By: /s/ N. Kathleen Strickland  
One of Defendant's Attorneys

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**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

I, N. Kathleen Strickland, am the ECF user whose identification and password are being used to file the foregoing Stipulated Request for Order Continuing Case Management Conference and [proposed] Order. I hereby attest that the above-referenced signatory to this Stipulated Request has concurred in this filing.

Dated: February 4, 2014

/s/ N. Kathleen Strickland  
N. Kathleen Strickland

Ropers Majeski Kohn & Bentley  
A Professional Corporation  
Redwood City


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**ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED as modified:**

The next Case Management Conference is set for **March 25, 2014** at 2 p.m. in Courtroom 2. The parties shall file a Joint Statement updating the status of the case by March 18, 2014.

Entered: February 5, 2014

  
\_\_\_\_\_  
HONORABLE WILLIAM H. ORRICK  
UNITED STATES DISTRICT JUDGE