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6 Attorneys for Defendant  
 GEORGE DOBBS

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

10 PIPING ROCK PARTNERS, INC., a California )  
 Corporation, and CHRISTOPHER K. )  
 11 GERMAIN, an individual, )  
 Plaintiffs, )

Case No. CV 12-04634 SI

12 **STIPULATED REQUEST TO CONTINUE**  
**CASE MANAGEMENT CONFERENCE;**  
**PROPOSED ORDER; ATTORNEY**  
**DECLARATION**

13 vs.

14 DAVID LERNER ASSOCIATES, INC., a New )  
 York Corporation, DAVID LERNER, an )  
 15 individual, and JOHN DOES Nos. 1-7, )  
 Defendants. )

Current hearing date: 08-28-2015  
 Time: 3:00 p.m.

16 Before the Honorable Susan Illston  
 United States District Court Judge

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 18 **STIPULATED REQUEST:**

19 Plaintiffs Piping Rock Partners, Inc. and Christopher K. Germain (collectively, "Plaintiffs"),  
 20 Defendants David Lerner and David Lerner Associates, Inc. (collectively, the "DLA Defendants"),  
 21 and Defendant George Dobbs, through their counsel of record, hereby agree and stipulate as follows:  
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23 WHEREAS, on August 18, 2015, this Court notified the parties that a further Case  
 24 Management Conference would be held on August 28, 2015.

25 WHEREAS, the current deadline for the parties to file a Joint Case Management Conference  
 26 Statement is August 24, 2015.

27 WHEREAS, due to scheduling conflicts, certain counsel are unavailable on the currently-  
 28 scheduled date for the Case Management Conference.

1 WHEREAS, counsel for the Parties have met and conferred to find an alternative date for the  
2 Case Management Conference.

3 WHEREAS, Plaintiffs have stipulated to continue the Case Management Conference for up to  
4 30 days after the currently-scheduled Case Management Conference, but oppose a longer continuance.

5 THEREFORE, pursuant to Civil Local Rule 6-2, the Parties hereby stipulate and request that  
6 this Court schedule the Parties' Case Management Conference for Friday, September 4, 2015, with the  
7 filing of the Joint Case Management Conference Statement to be filed on or before August 31, 2015.

8 **IT IS SO STIPULATED AND REQUESTED.**

9 DATED: August 24, 2015

/s/ Benjamin W. White  
BENJAMIN W. WHITE  
KEVIN J. WOODS  
WHITE & WOODS LLP  
Attorneys for Defendant  
GEORGE DOBBS

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13 DATED: August 24, 2015

/s/ Bibianne Uychinco Fell  
(e-signature expressly authorized on August  
24, 2015)  
Gomez Trial Attorneys  
Attorneys for Plaintiffs


14  
15  
16 DATED: August 24, 2015

/s/ Christopher A. Stecher  
(e-signature expressly authorized  
on August 24, 2015)  
STEPHEN YOUNG  
CHRISTOPHER A. STECHER  
NATHAN R. JASKOWIAK  
KEESAL, YOUNG & LOGAN

MICHAEL G. SHANNON  
JENNIFER S. ROACH  
MATHEW D. RIDINGS  
THOMPSON HINE, LLP  
  
Attorneys for Defendants  
DAVID LERNER ASSOCIATES, INC. and  
DAVID LERNER

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25 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

26 Dated: August 25, 2015

  
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The Honorable Susan Illston  
United States District Court Judge