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 6 ASSOCIATES, INC. and DAVID LERNER

7 *Pursuant to Civil Local Rule 3-4(a)(1), please refer to the signature*
 8 *pages for the complete list of parties represented on this Stipulation*

9
 10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**

12 PIPING ROCK PARTNERS, INC., a California) corporation, and CHRISTOPHER K.) 13 GERMAIN, an individual,)) 14 Plaintiffs,)) 15 vs.)) 16 DAVID LERNER ASSOCIATES, INC., a New) York corporation, DAVID LERNER, an) 17 individual, and GEORGE DOBBS, an individual,)) 18 Defendants.)	Case No. C 12-4634 SI STIPULATED REQUEST AND [PROPOSED] ORDER TO CONTINUE MOTION HEARING AND INITIAL CASE MANAGEMENT CONFERENCE Date: April 19, 2012 Time: 9:00 a.m. and 2:30 p.m. Judge: Honorable Susan Illston (Courtroom 10)
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19 **STIPULATED REQUEST**

20 IT IS HEREBY STIPULATED AND AGREED by and between all parties and their
 21 respective counsel as follows:

22 WHEREAS, the Initial Case Management Conference is currently scheduled to take
 23 place on March 29, 2013 at 2:30 p.m.;

24 WHEREAS, a hearing on Plaintiffs' special motion to strike is currently scheduled to
 25 be heard on March 29, 2013 at 9:00 a.m.;

26 WHEREAS, a hearing on Defendants' special motions to strike is currently scheduled
 27 to be heard on March 29, 2013 at 9:00 a.m.;

1 WHEREAS, due to scheduling conflicts, the parties wish to re-schedule the Initial Case
2 Management Conference and the argument on Plaintiffs' and Defendants' special motions to strike to
3 April 19, 2013, at 2:30 p.m. and 9:00 a.m., respectively;

4 WHEREAS, the parties contacted the Court's chambers and determined that April 19,
5 2013 was an available date on which the Court conduct these hearings;

6 WHEREAS, good cause exists to move the date of the Initial Case Management
7 Conference to April 19, 2013 at 2:30 p.m. and to move the hearing on Plaintiffs' and Defendants'
8 special motions to strike to April 19, 2013 at 9:00 a.m.;

9 THEREFORE, the parties submit this stipulated request pursuant to Civil Local Rule 6-
10 2 requesting that the date of the Initial Case Management Conference be continued to April 19, 2013,
11 at 2:30 p.m. and that the hearing on Plaintiffs' and Defendants' special motions to strike be heard on
12 April 19, 2013 at 9:00 a.m. Nothing in this stipulation is intended to affect the briefing schedule for
13 the motions identified herein.

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

15
16 DATED: March 6, 2013

/s/ Michael G. Shannon

STEPHEN YOUNG
CHRISTOPHER A. STECHER
NATHAN R. JASKOWIAK
KEESAL, YOUNG & LOGAN

MICHAEL G. SHANNON
JENNIFER S. ROACH (*admitted pro hac vice*)
MATTHEW D. RIDINGS (*admitted pro hac vice*)
THOMPSON HINE LLP (*admitted pro hac vice*)

Attorneys for Defendants
DAVID LERNER ASSOCIATES, INC. and DAVID
LERNER

1 DATED: March 6, 2013

/s/ Benjamin W. White
(E-signature expressly authorized on March 6, 2013)
BENJAMIN W. WHITE
KEVIN J. WOODS
WHITE & WOODS, LLP

Attorneys for Defendant
GEORGE DOBBS

6 DATED: March 6, 2013

/s/ Thomas D. O'Brien
(E-signature expressly authorized on March 6, 2013)
JONATHAN S. BALL
THOMAS D. O'BRIEN
BALL LAW CORPORATION

Attorneys for Plaintiffs
PIPING ROCK PARTNERS INC. &
CHRISTOPHER K. GERMAIN

13 **[PROPOSED] ORDER**

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

17 DATED: 3/7, 2013



THE HONORABLE SUSAN ILLSTON
United States District Judge