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15 Latroya Simpson

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

18 LATROYA SIMPSON, individually and
19 on behalf of a class of similarly situated
individuals,

20 Plaintiff,

21 vs.

22 BEST WESTERN INTERNATIONAL,
INC., and DOES 1 through 10, inclusive,

23 Defendants.

Case No. 3:12-cv-04672

**STIPULATION AND ORDER TO
EXTEND BRIEFING SCHEDULE
AND TO CONTINUE HEARING
ON DEFENDANT'S MOTION TO
DISMISS AND DEFENDANT'S
MOTION TO TRANSFER VENUE
TO THE CENTRAL DISTRICT OF
CALIFORNIA**

Honorable Magistrate Judge Joseph C.
Spero

Date: October 19, 2012
Time: 9:30 a.m.
Courtroom: G

[Declaration of David B. Farkas
submitted concurrently herewith]

Case No. 3:12-cv-04672

STIP AND ORDER TO EXTEND BRIEFING SCHEDULE AND TO CONTINUE HRG ON DEFENDANT'S
MTN TO DISMISS AND MTN TO TRANSFER VENUE

1 Plaintiff Latroya Simpson (“Plaintiff”) and Defendant Best Western
2 International, Inc. (“Defendant”), by and through their undersigned attorneys, hereby
3 stipulate as follows:

4 WHEREAS, on June 20, 2012, Plaintiff filed the Complaint in this action in
5 the Superior Court of the State of California for the County of Alameda;

6 WHEREAS, on September 7, 2012, Defendant timely removed the case to this
7 Court;

8 WHEREAS, on September 14, 2012, Defendant timely filed a Motion to
9 Transfer Venue to the Central District of California (Docket No. 5) and a Motion to
10 Dismiss/Motion to Strike Plaintiff’s Complaint (Docket No. 8);

11 WHEREAS, Defendant’s Motions are currently set for hearing on October 19,
12 2012 at 9:30 a.m. in Courtroom G of the above-entitled Court;

13 WHEREAS, Plaintiff’s Oppositions to Defendant’s Motions are currently due
14 on September 28, 2012 and whereas Defendant’s Replies in Support of its Motions
15 are currently due on October 5, 2012; and

16 WHEREAS, Plaintiff has requested a one-week extension for her deadline to
17 file an Opposition to Defendant’s Motions, and whereas Defendant has agreed to that
18 extension;

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1 **THEREFORE**, Plaintiff and Defendant stipulate, subject to the Court's
2 approval, that:

- 3 1. Plaintiff's Oppositions to Defendant's Motion to Dismiss and Motion to
4 Transfer Venue to the Central District shall be due on October 9, 2012;
5 2. Defendant's Replies in Support of its Motion to Dismiss and Motion to
6 Transfer Venue to the Central District shall be due on October 23, 2012;
7 3. The hearing on Defendant's Motion to Transfer Venue to the Central District
8 of California and Motion to Dismiss/Strike Plaintiff's Complaint, currently set
9 for October 19, 2012 at 9:30 a.m., is continued to November 9, 2012 at 9:30
10 a.m. in Courtroom G of the above-entitled Court.

11
12 Dated: September 25, 2012

LINER GRODE STEIN YANKELEVITZ
SUNSHINE REGENSTREIF & TAYLOR LLP

13
14 By: /s/ Angela C. Agrusa
15 Angela C. Agrusa, Esq.
16 Attorneys for Defendant
 Best Western International, Inc.

17 Dated: September 25, 2012

KELLER GROVER LLP

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21 By: /s/ Eric Grover
22 Eric Grover, Esq.
23 Attorneys for Plaintiff Latroya
24 Simpson

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

26 Dated: September 26, 2012

/s/ Joseph C. Spero
Honorable Magistrate Judge
Joseph C. Spero

1 **PROOF OF SERVICE**

2
3 I am employed in the County of Los Angeles, State of California. I am over
4 the age of 18 and not a party to the within action. My business address is 1100
5 Glendon Avenue, 14th Floor, Los Angeles, California 90024-3503. On , I served the
6 within document(s) described as:

7 **STIPULATION AND ORDER TO EXTEND BRIEFING SCHEDULE
8 AND TO CONTINUE HEARING ON DEFENDANT'S MOTION TO DISMISS
9 AND DEFENDANT'S MOTION TO TRANSFER VENUE TO THE
10 CENTRAL DISTRICT OF CALIFORNIA**

11 on the interested parties in this action as stated below:

12 Eric Grover, Esq.
13 Carey G. Been, Esq.
14 KELLER GROVER LLP
15 1965 Market Street
16 San Francisco, California 94103
17 Telephone: (415) 543-1305
18 Facsimile: (415) 543-7861
19 Email: eagrover@kellergrover.com
20 Email: cbeen@kellergrover.com

21 (BY E-MAIL) By transmittal of the foregoing document to the email
22 addresses set forth above through the Court's CM/ECF filing system.

23 I declare under penalty of perjury under the laws of the State of California that
24 the foregoing is true and correct.

25 Executed on September 25, 2012, at Los Angeles, California.

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