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24 Attorneys for Defendant  
25 AT&T MOBILITY LLC

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1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA

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4 MAHER QADOME, an individual;  
5 SAQIB HUSSAIN, an individual;  
6 and HASSAN ALI KHAN, an  
7 individual,

8 Plaintiffs,

9 v.

10 CELCITE MANAGEMENT  
11 SOLUTIONS, LLC, a Delaware  
12 limited liability company; AT&T  
13 MOBILITY LLC, a Delaware  
14 limited liability company; and DOES  
15 1-100,

16 Defendant.

CASE NO. 3:12-cv-05253-JSW

Hon. Jeffrey S. White [Ctrm 11]

**JOINT STIPULATION OF THE  
PARTIES FOLLOWING INITIAL  
CASE MANAGEMENT  
CONFERENCE; [PROPOSED]  
ORDER**

Complaint filed: October 11, 2012

17 The Parties have met and conferred on the three matters that the Court  
18 ordered the Parties to further confer about. Having done so, Plaintiffs MAHER  
19 QADOME, SAQIB HUSSAIN and HASSAN ALI KHAN (“Plaintiffs”) and  
20 Defendants CELCITE MANAGEMENT SOLUTIONS, LLC and AT&T  
21 MOBILITY, LLC (“Defendants”), now submit the following Stipulation pursuant  
22 to this Court’s Order dated March 8, 2013.

23 1. Magistrate Judge

24 The Parties have conferred and they decline reassignment to a Magistrate  
25 Judge.

26 2. Alternative Dispute Resolution

27 The Parties have conferred further about Alternative Dispute Resolution and  
28 they request the use of the Court’s Early Neutral Evaluation Program. Furthermore,  
the Parties have reviewed the Court approved neutrals and have agreed upon  
individuals to submit to the Court’s ADR.

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3. Summary Judgment Schedule

The Parties request a hearing on Judge White’s first available hearing date in the month of December 2013. Further the Parties submit the following briefing schedule for the anticipated cross-motions for summary judgment:

- 1. The Joint Opening Brief of the Defendants should be filed 7 weeks prior to the hearing on the Cross Motions for Summary Judgment.
- 2. The Opening Brief of the Plaintiffs should be filed 5 weeks prior to the hearing on the Cross Motions for Summary Judgment.
- 3. The Joint Reply Brief/Opposition to Plaintiffs’ Motion for Summary Judgment should be filed 3 weeks prior to the hearing on the Cross Motions for Summary Judgment.
- 4. The Plaintiffs’ Reply Brief should be filed 1 week prior to the hearing on the Cross Motions for Summary Judgment.

DATED: March 15, 2013

Respectfully submitted,  
VENARDI ZURADA LLP

By: /s/ Mark L. Venardi  
Mark L. Venardi  
Attorneys for Plaintiffs  
MAHER QADOME, SAQUB  
HASSAIN and HASSAN ALI KHAN

1 DATED: March 15, 2013

FORD & HARRISON LLP

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By: /s/ Stefan H. Black  
Stefan H. Black

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SOLUTIONS, LLC

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9 DATED: March 15, 2013

MILLER LAW GROUP  
A Professional Corporation

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By: /s/ Donna M. Rutter  
Donna M. Rutter

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Attorneys for Defendant  
ATT&T MOBILITY LLC

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