

1 Roy A. Katriel (SBN 265463)  
 2 THE KATRIEL LAW FIRM  
 3 12707 High Bluff Drive, Suite 200  
 4 San Diego, California 92130  
 Telephone: (858) 350-4342  
 Facsimile: (858) 430-3719  
 e-mail: [rak@katriellaw.com](mailto:rak@katriellaw.com)

5 *Counsel for Plaintiffs*

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 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA

10 MAJEED SEIFI AND TRACEY  
 11 DEAKIN, On Behalf Of Themselves  
 And All Others Similarly Situated

12 Plaintiffs,

13 v.

14 MERCEDES-BENZ USA, LLC,

15 Defendant.

No. 12-CV-05493 (TEH)

**STIPULATED REQUEST TO CONTINUE  
 BRIEFING DEADLINES AND HEARING ON  
 DEFENDANT’S MOTION TO TRANSFER  
 VENUE AND TO POSTPONE CASE  
 MANAGEMENT CONFERENCE;  
 DECLARATION OF ROY A. KATRIEL IN  
 SUPPORT THEREOF**

**[N.D. CAL. L.R. 6-2]**

**IT IS SO ORDERED AS MODIFIED**

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By and through their respective counsel of record, Plaintiffs Majeed Seifi and Tracey Deakin, as individuals and on behalf of all others similarly situated (collectively “Plaintiffs”), and Defendant Mercedes-Benz USA, LLC (“MBUSA”) stipulate and agree as follows:

**STIPULATED REQUEST FOR ORDER CHANGING TIME PURSUANT TO L.R. 6-2**

1. On January 28, 2013, Defendant MBUSA filed a Motion to Transfer Venue (Dkt. No. 12), as well as a Motion To Dismiss Plaintiffs Complaint and To Strike Class Allegations (Dkt. No. 9). Both motions were calendared for a hearing on March 4, 2013, making Plaintiffs’ responses to both motions due by February 11, 2013, and MBUSA’s replies due by February 19, 2013.

2. On February 5, 2013, the Court entered an Order vacating the briefing schedule and hearing date on MBUSA’s Motion to Dismiss, indicating that it would hear the Motion to Transfer Venue first on the previously calendared date of March 4, 2013.

3. Plaintiffs respectfully request, and MBUSA does not oppose, a two-week extension of the briefing deadline for filing their opposition to MBUSA’s Motion to Transfer Venue, which would make Plaintiffs’ opposition due by February 25, 2013. Likewise, Plaintiffs do not oppose MBUSA’s request for a corresponding three-week extension of time to file its reply in support of the Motion to Transfer Venue, making MBUSA’s reply due by March 11, 2013. These requested extensions, if granted, would also require the postponement of the current hearing date on the pending motion until March 25, 2013.

4. As set forth in the accompanying Declaration of Roy A. Katriel, this extension request is being made in good faith because Plaintiffs’ co-counsel who is a primary contact to one of the named plaintiffs, is and will be out of town on another pending matter over the next week, and also because, in response to MBUSA’s Motion to Transfer Venue, Plaintiffs’ counsel intend to submit certain Declarations or Affidavits that must be







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6. As there are no other scheduled matters in this case, the requested time modification would have no effect on the schedule for the case.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 6th day of February 2013, at San Diego, California.

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/s/ Roy A. Katriel  
ROY A. KATRIEL

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**ORDER**

For good cause shown, the Court hereby enters the Stipulation set forth above as the Order of the Court. The schedule in this case is hereby modified as follows:

- Opposition to Motion to Transfer New Deadline: February 25, 2013
- Reply to Motion to Transfer Venue New Deadline: March 11, 2013  
April 1, 2013
- New Hearing Date on Motion to Transfer Venue: ~~March 25, 2013~~
- New Case Management Conference Date: June 24, 2013
- Joint Case Management Statement New Deadline: June 17, 2013
- Last Day To Hold Rule 26(f) Conference: June 3, 2013

**IT IS SO ORDERED.**

Dated: 02/07, 2013

By: \_\_\_\_\_

