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18 Counsel for Plaintiff

19 **IN THE UNITED STATES DISTRICT COURT**
 20 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

21 JON T. KING
 22
 23 Plaintiff,
 24
 25 v.
 26 MICHAEL D. HAUSFELD and
 27 HAUSFELD LLP
 28 Defendants.

CASE NO. C-13-0237 EMC
 Hon. Edward M. Chen
 Courtroom 5
**STIPULATED REQUEST TO
 RESCHEDULE CASE
 MANAGEMENT
 CONFERENCE**
Current CMC: April 18, 2013
Proposed CMC: May 30, 2013
 Action Filed: January 17, 2013

VENABLE LLP
 2049 CENTURY PARK EAST, SUITE 2100
 LOS ANGELES, CA 90067
 310-229-9900

1 Plaintiff Jon T. King (“Plaintiff”) and Defendants Michael D. Hausfeld and
2 Hausfeld LLP (“Defendants” and, together with Plaintiff, the “Parties”), by and
3 through their respective counsel of record, hereby stipulate and agree as follows:

4 **RECITALS**

5 A. On January 17, 2013, Plaintiff filed a complaint for Wrongful
6 Termination in Violation of Public Policy against Defendants.

7 B. On January 22, 2013, Defendants filed a motion to dismiss or,
8 alternatively, for an immediate stay of the case (“Motion”).

9 C. On March 7, 2013, the Court issued a Minute Order stating that it
10 would take Defendants’ Motion under submission.

11 D. A Case Management Conference in this case is currently set for
12 April 18, 2013 at 9:00 a.m. in Courtroom 5 of the above-captioned court.

13 E. Good cause exists to reschedule the upcoming Case Management
14 Conference because the question of the proper forum for adjudication of this action
15 – judicial or arbitral – has yet to be determined. Accordingly, the resources of the
16 Parties and the Court are best conserved by the requested continuance, which does
17 not prejudice the rights of either Party. Additionally, if the Motion is granted, the
18 Case Management Conference will be moot; and, if denied, the Case Management
19 Conference only minimally delayed.

20
21 **AGREEMENT**

22 1. The Recitals set forth above are incorporated by this reference as
23 though fully set forth herein.

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310-229-9900

2. The Case Management Conference shall be continued to May 30, 2013, or such other time as convenient for the Court.

Dated: April 4, 2013

VENABLE, LLP

By: /s/ Daniel P. Hoffer

Daniel P. Hoffer

Jennifer Levin

Attorneys for Defendants Michael D.

Hausfeld and Hausfeld LLP

Dated: April 4, 2013

LAW OFFICES OF JON T. KING

By: /s/ Jon. T. King

Jon T. King

Counsel for Plaintiff

VENABLE LLP
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SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing STIPULATED REQUEST TO RESCHEDULE CASE MANAGEMENT CONFERENCE. In compliance with General Order 45.X.B., I hereby attest that the other signatories to this filing have concurred in this filing.

Dated: April 4, 2013

VENABLE, LLP

By: /s/ Daniel P. Hoffer
Daniel P. Hoffer
Jennifer Levin
Attorneys for Defendants Michael D.
Hausfeld and Hausfeld LLP

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CERTIFICATE OF SERVICE

I, Daniel P. Hoffer, declare that I am over the age of eighteen (18) and not a party to the entitled action. I am a partner in the law firm of VENABLE LLP, and my office is located at 2049 Century Park East, Suite 2100, Los Angeles, CA 90067.

On April 4, 2013, I caused to be filed the following: **STIPULATED REQUEST TO RESCHEDULE CASE MANAGEMENT CONFERENCE** with the Clerk of the Court using the Official Court Electronic Document Filing System which served copies on all interested parties registered for electronic filing.

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

/s/ Daniel P. Hoffer
Daniel P. Hoffer

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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

JON T. KING

Plaintiff,

v.

MICHAEL D. HAUSFELD and
HAUSFELD LLP

Defendants.

CASE NO. C-13-0237 EMC

Hon. Edward M. Chen
Courtroom 5

**[PROPOSED] ORDER
GRANTING STIPULATED
REQUEST TO RESCHEDULE
CASE MANAGEMENT
CONFERENCE**

Action Filed: January 17, 2013

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The Court, having read and considered the Stipulated Request to Reschedule Case Management Conference, hereby GRANTS the stipulated request.

IT IS HEREBY ORDERED that the Case Management Conference is continued to May 30, 2013 at 9:00 a.m. in Courtroom 5 of the above-captioned court.

4/8/13

DATED: _____



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CERTIFICATE OF SERVICE

I, Daniel P. Hoffer, declare that I am over the age of eighteen (18) and not a party to the entitled action. I am a partner in the law firm of VENABLE LLP, and my office is located at 2049 Century Park East, Suite 2100, Los Angeles, CA 90067.

On April 4, 2013, I caused to be filed the following: **[PROPOSED] ORDER GRANTING STIPULATED REQUEST TO RESCHEDULE CASE MANAGEMENT CONFERENCE** with the Clerk of the Court using the Official Court Electronic Document Filing System which served copies on all interested parties registered for electronic filing.

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/s/ Daniel P. Hoffer
Daniel P. Hoffer

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