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Dated: 6/3/2013

STIPULATION & REQUEST

The Parties, by and between counsel, hereby Stipulate to Extend the date to respond to the Plaintiffs Complaint to **July 3, 2013**. July 3, 2013 is thirty days from the date designated for response date on the Waiver of Service of Summons to Defendants. Undersigned Counsel for Defendants was retained in the matter on May 31, 2013.

The Parties further request this Honorable Court to Amend the Initial Case Management and Conference Dates. The current date for the parties to meet and confer about Rule 26 and Alternative Dispute Resolution is June 4, 2013. The current dates for to file the Rule 26(f) Report, complete initial disclosures and file a Case Management Conference date is June 18, 2013. The Initial Case Management Conference is set for June 25, 2013. Undersigned Counsel will be travelling overseas from June 17, 2013 to June 27, 2013 and will be unavailable for the June 25, 2013 Case Management Conference.

FARBER & COMPANY ATTORNEYS, P.C.

BY: \_\_\_\_\_/s/\_\_\_

Eric J. Farber, Esq. Attorneys for Defendants Vernon Davis and Amadou Tall

1	Dated: 6/3/2013	ODIM LAW OFFICES
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4		BY: /s/ Carlton Odim, Esq.
5		(Admission Pro Hac Vice)
6		Attorneys for Plaintiffs Kal Ross & The Kal Ross Agency
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Farber & Company Attorneys, P.C. Notice of Motion and Motion -- 3 *The Kal Ross Agency, et al. v. Davis, et al. Case Number: C13-1380 EDL* United States District Court, Northern District of California

## **MODIFIED** PROPOSED ORDER

The Stipulation to extend the time to answer or otherwise respond to the Complaint is

Good Cause Appearing, the Request of Counsel to vacate the current case management

dates is Granted. The Case Management Conference is reset to July 23, 2013, at 10:00 a.m., and the Joint Case

approved.

Management Statement is due July 16, 2013.

Dated: June 6, 2013

Elizabeth LaPorte

Hod. Mag. Elizabeth LaPorte

continue

Farber & Company Attorneys, P.C. Notice of Motion and Motion -- 4

The Kal Ross Agency, et al. v. Davis, et al. Case Number: C13-1380 EDL

United States District Court, Northern District of California