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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CALIFORNIA BUSINESS SERVICES
CENTER, LLC dba JUSTICE PCS,

Plaintiff,

vs.

CITY OF SANTA ROSA, et al.

Defendants.

Case Nos.: CV 13-3820 SI; CV 13-3997 SI;
CV 13-4423 SI

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO CONTINUE CASE
MANAGEMENT CONFERENCE**

AND RELATED ACTIONS

1 Plaintiffs California Business Services Center, LLC d.b.a. Justice PCS; Liberty LCS,
2 LLC; and Urban PCS, LLC (together "Plaintiffs"), and Defendants City of Santa Rosa, City of
3 Gilroy, Scott Barron, and City of Watsonville (together "Defendants") (collectively "Parties")
4 submit this stipulation to continue the Case Management Conference presently set for July 11,
5 2014, at 3:00 p.m., in Department 10 of this Court. The Parties request that the Conference be
6 rescheduled for August 15, 2014, or any subsequent date that is convenient to the Court.

7 Plaintiff agrees to voluntarily dismiss these related actions and all causes of action
8 against all defendants with prejudice on August 1, 2014, unless Plaintiff establishes that all of the
9 following events have occurred on or before that date:

10 a. The California Supreme Court grants the petition for review in the presently
11 pending appeal of *People v. Grewal*, Superior Court of California, County of Kern Case Nos.
12 F065450/F065451/F0654689;

13 b. A jury reaches a verdict of not guilty in the matter of *People v. Byrne, et al.*,
14 Superior Court of California, County of Santa Clara Case No. F1449688;

15 c. The California Legislature or the Governor declines to pass A.B. 1439 (Unfair
16 business practices: contests and sweepstakes).

17 A brief continuance is appropriate to conserve judicial resources and prevent an
18 unnecessary expenditure of time on a matter that may soon be dismissed.

19 THEREFORE, the Parties hereby stipulate to continue the Case Management Conference
20 presently set for July 11, 2014, at 3:00 p.m., in Department 10 of this Court, to August 15, 2014,
21 or any subsequent date that is convenient to the Court.

22 IT IS SO STIPULATED.

23
24 Dated: June 24, 2014

MOSCONE EMBLIDGE SATER & OTIS
LLP

25
26 
27 Matthew K. Yan
28 Attorney for Plaintiffs CALIFORNIA
BUSINESS SERVICES CENTER, LLC dba
JUSTICE PCS; and LIBERTY PCS, LLC

1 Dated: June 23, 2014

SELMAN BREITMAN LLP

2
3 /s/ signature authorized
Danielle K. Lewis
4 Attorney for Defendants
CITY OF GILROY and SCOTT BARRON

5 Dated: June 23, 2014

OFFICE OF THE CITY ATTORNEY

6
7 /s/ signature authorized
John J. Fritsch
8 Assistant City Attorney
Attorney for Defendant
9 CITY OF SANTA ROSA

10 Dated: June 23, 2014

GRUNSKY, EBAY, FARRAR & HOWELL

11 /s/ signature authorized
12 Reed W. Gallogly
13 Attorney for Defendant
CITY OF WATSONVILLE

14
15 **ORDER**

16 The Parties having stipulated and agreed as described above, and the Court having found
17 good cause therefor,

18 IT IS HEREBY ORDERED that the Case Management Conference presently set for July
19 11, 2014, at 3:00 p.m., in Department 10 of this Court, be continued to August 15, 2014 at
20 3:00 p.m. in Department 10 of this Court.

21 6/24/14
22 Dated: _____

23 

24 _____
25 Honorable Susan Illston
26 United States District Judge