1	J. TIMOTHY NARDELL (State Bar #184444)		
2			
3			
4	Facsimile:(415) 457-1420Email:tim@ncalegal.com		
5	JENNIFER INSLEY-PRUITT ( <i>Pro Hac Vice</i> application pending) FROSS ZELNICK LEHRMAN & ZISSU, P.C. 866 United Nations Plaza		
6			
7			
8	Telephone: (212) 813-5900 Facsimile: (212) 812-5901		
9	Email: jmargiotta@fzlz.com jinsley-pruitt@fzlz.com		
10	Attorneys for Plaintiff CARTIER INTERNATIONAL		
11	AG and CARTIER, a division of RICHEMONT NORTH AMERICA, INC.		
12			
13	UNITED STATES DISTRICT COURT		
14	NORTHERN DISTRICT OF CALIFORNIA		
15	SAN FRANCISCO DIVISION		
16			
17	CARTIER INTERNATIONAL AG and CARTIER, a division of RICHEMONT	Case No. CV 13 4544 EMC	
18	NORTH AMERICA, INC.,	STIPULATION AND [PROPOSED ORDER] TO ALLOW COUNSEL FOR	
19	Plaintiffs,	PL <del>AINTIFF TO APPEA</del> R T <del>ELEPHONICALLY AT HEARING</del>	
20	VS.	A <del>ND/OR</del> EXTEND THE HEARING DATE	
21	CARTER CELLARS, ENVY WINES, LLC, CHRISTY CARTER, MARK	Action Filed: October 1, 2013	
22	CARTER, NILS VENGE, and DOES 1-10,		
23	Defendants.		
24			
25			
26			
27			
28			
		OW COUNSEL FOR PLAINTIFF TO APPEAR TELEPHONICALLY AT OR EXTEND THE HEARING DATE	
		CV 13 4544 EMC Dockets.Justia.com	
		DUCKEIS.JUSIId.CUII	

1 WHEREAS the Initial Case Management Conference in this action and Plaintiffs' Motion to 2 Strike Various Affirmative Defenses are currently scheduled to be heard on February 6, 2014 at 1:30 3 p.m. 4 WHEREAS John P. Margiotta, who intends to serve as lead counsel for Plaintiffs Cartier 5 International AG and Cartier in this action, lives and works in New York City and has a conflict that 6 prevents him from travelling to California to be present in person at the hearings scheduled for February 7 6, 2014. 8 THEREFORE Pursuant to Civil L.R. 7-11 and 7-12, the parties, by and through the undersigned 9 counsel, hereby request by stipulation that the Court allow Mr. Margiotta appear at the hearings on 10 February 6, 2014 by telephone, or in the alternative, continue the Initial Case Management Conference 11 and hearing on Plaintiffs' Plaintiffs' Motion to Strike Various Affirmative Defenses to another date. 12 If the Court determines that rescheduling the hearings of these matters, the parties agree that 13 February 13 or February 27 at 1:30 p.m., would be mutually convenient dates for the hearing of these 14 matters, at which time counsel for all parties could make arrangements to be personally present in 15 Court. 16 IT IS SO STIPULATED. 17 Dated: January 21, 2013 NARDELL CHITSAZ & ASSOCIATES LLP 18 19 By: /s/ J. Timothy Nardell J. TIMOTHY NARDELL 20Attorneys for Plaintiffs CARTIER INTERNATIONAL AG and CARTIER, a division 21 of RICHEMONT NORTH AMERICA, INC. 22 AND 23 JOHN P. MARGIOTTA (pro hac vice application pending) 24 JENNIFER INSLEY-PRUITT (pro hac vice application pending) 25 FROSS ZELNICK LEHRMAN & ZISSU, P.C. Attorneys for Plaintiffs CARTIER 26 INTERNATIONAL AG and CARTIER, a division of RICHEMONT NORTH AMERICA, INC. 27 28 STIPULATION AND [PROPOSED ORDER] TO ALLOW COUNSEL FOR PLAINTIFF TO APPEAR TELEPHONICALLY AT HEARING AND/OR EXTEND THE HEARING DATE

1	Dated: January 21, 2014 HAAPALA, THOMPSON & ABERN, LLP		
2			
3	By: /s/ Benjamin A. Thompson Benjamin A. Thompson		
4	Attorneys For Defendants		
5	ORDER		
6	The Court having considered the parties' stipulation, and good cause appearing, the Court		
7	hereby orders that:		
8	John P. Margiotta may appear telephonically at the Initial Case Management Conference		
9	and the hearing of Plaintiffs' Motion to Strike Various Affirmative Defenses, on		
10	February 6, 2014 at 1:30 p.m.		
11			
12	The Initial Case Management Conference and the hearing of Plaintiffs' Motion to Strike		
13	Various Affirmative Defenses shall be continued to $\frac{2/27/14}{2}$ at $1:30$ p.m.		
14	A joint CMC statement shall be filed 7 days before the CMC.		
15	PURSUANT TO STIPULATION, IT IS SO ORDERED.		
16	TES DISTRICE		
17	Dated:		
18	UNVER STATES DEBED UNE		
19	UNITED STATES DE IT IS SO ORDERED DEA SMODIFIED		
20			
21	Z Judge Edward M. Chen		
22			
23	DISTRICT OF		
24	SISTRICI		
25			
26			
27			
28			
_0	2 STIPULATION AND [PROPOSED ORDER] TO ALLOW COUNSEL FOR PLAINTIFF TO APPEAR TELEPHONICALLY AT HEADING AND/OD EXTEND THE HEADING DATE		
	HEARING AND/OR EXTEND THE HEARING DATE CV 13 4544 EMC		