

1 LEE TRAN LIANG & WANG LLP
 Enoch H. Liang (SBN 212324)
 2 enoch.liang@lflattorneys.com
 Heather F. Auyang (SBN 191776)
 3 heather.auyang@lflw.com
 Lisa J. Chin (SBN 259793)
 4 lisa.chin@lflattorneys.com
 601 South Gateway Blvd., Suite 1010
 5 South San Francisco, CA 94080
 Telephone: (650) 241-2140
 6 Facsimile: (213) 612-3773

7 Attorneys for Defendant Symmetricom, Inc.

8
 9 **UNITED STATES DISTRICT COURT**
 10 **FOR NORTHERN DISTRICT OF CALIFORNIA**
 11 **SAN FRANCISCO DIVISION**

13 GLASSEY ET AL,

15 Plaintiff(s),

16 v.

18 SYMMETRICOM, INC.,

19 Defendant(S).

Case No. 3:13-cv-04662 (NC)

15 **STIPULATION AND ~~PROPOSED~~**
ORDER TO CONTINUE CASE
MANAGEMENT CONFERENCE AND
ADR DEADLINES PURSUANT TO L.R.
6-1(b)

Judge: The Honorable Nathanael Cousins
 Date: February 12, 2014
 Time: 10:00 AM
 Dept: Courtroom A, 15th Floor

22
 23 WHEREAS, on October 7, 2013, Todd S. Glassey and Michael F. McNeil
 24 (“Plaintiffs”) filed the above-captioned complaint in this Court (“Complaint”);

25 WHEREAS, on October 8, 2013, the Court issued an Order Setting Initial
 26 Case Management and ADR Deadlines setting the initial case management
 27 conference for January 8, 2014 at 10:00 AM (Dkt. No. 5);

1 WHEREAS, on October 31, 2013, Defendant Symmetricom, Inc.
2 (“Symmetricom”) and Plaintiffs (together, “the Parties”) agreed that Symmetricom’s
3 answer or motion under Rule 12 must be filed by December 30, 2013;

4 WHEREAS, Symmetricom agreed to file a motion to dismiss all claims
5 against it on or before December 30, 2013;

6 WHEREAS, on December 13, 2013, the Parties filed a Stipulation and
7 Proposed Order to postpone the January 8, 2014 initial case management conference
8 and a continuance of the ADR Deadlines (Dkt. No. 15) in view of Symmetricom’s
9 forthcoming motion to dismiss;

10 WHEREAS, on December 16, 2013, the Court entered an Order modifying
11 the date of the initial case management conference to February 12, 2014 at 10:00
12 AM and granted a continuance of the ADR Deadlines (Dkt. No. 16);

13 WHEREAS, on or around December 20, 2013, Symmetricom retained new
14 counsel from the firm of Lee Tran Liang & Wang LLP (Notices of Appearances
15 filed concurrently with this Stipulation and Proposed Order);

16 WHEREAS, Symmetricom’s new counsel requires an extension of time in
17 order to review the case file;

18 WHEREAS, the Parties agree to a 30-day extension for Symmetricom to file
19 a responsive pleading to the Complaint on or before January 29, 2014;

20 WHEREAS, the interests of judicial economy and efficiency would best be
21 served by postponing the initial case management conference and ADR Deadlines
22 until after the Court rules upon Symmetricom’s forthcoming responsive pleading;

23
24 IT IS THEREFORE STIPULATED AND AGREED, by and among the
25 Parties and their respective counsel of record, that:

- 26
27 1. Symetricom shall file its responsive pleading to the Complaint
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- on or before January 29, 2014;
- 2. The initial case management conference in this matter currently scheduled for February 12, 2014 at 10:00 AM shall be continued until a date set by the Court;
- 3. All other deadlines set forth in the Court’ Order Setting Initial Case Management Conference and ADR Deadlines be continued accordingly.

Dated: December 24, 2013

LEE TRAN LIANG & WANG LLP

By: /s/ Enoch H. Liang
 Enoch H. Liang, Bar No. 212324
 Heather F. Auyang, Bar, No. 191776
 Lisa J. Chin, Bar No. 259793
 601 South Gateway Blvd., Suite 1010
 South San Francisco, CA 94080
 Telephone: (650) 241-2140
 Facsimile: (213) 612-3773

*Attorneys for Defendant
 SYMMETRICOM, INC.*

Dated: December 24, 2013

ROSS BABBITT CO LPA

By: /s/ Ross Babbitt
 Ross Babbitt (*pro hac vice*)
 700 West St. Clair Avenue
 Hoyt Block, Suite 200
 Cleveland, OH 44113
 Telephone: (216) 623-6346
 Facsimile: (216) 274-9683

MAHANY & ERTL
 Brian Howard Mahany (*pro hac vice*)
 P.O. Box 511328

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Milwaukee, WI 53202

STEBURG LAW FIRM
Anita L. Steburg, Bar No. 245933
1798 Technology Drive, Suite 258
San Jose, CA 95110

*Attorneys for Plaintiffs TODD S.
GLASSEY and MICHAEL E. MCNEIL*

~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. Case Management
Conference is continued to March 12, 2014 at 3:00 p.m. Joint case management statement due March 5.

Dated: December 26, 2013

The Honorable Nathanael Cousins
Magistrate Judge

