

1 SHERRY B. SHAVIT, ESQ.; STATE BAR NO.: 193222
 E-mail: sshavit@tharpe-howell.com
 2 STUART E. COHEN; STATE BAR NO.: 213810
 E-mail: scohen@tharpe-howell.com
 3 **THARPE & HOWELL, LLP**
 15250 Ventura Blvd., Ninth Floor
 4 Sherman Oaks, California 91403
 Tel: (818) 205-9955
 5 Fax: (818) 205-9944

6 [Additional counsel on signature page]

7 Attorneys for Defendant,
 8 SECURITAS SECURITY SERVICES,
 USA, INC.

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UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA

MICHAEL DEATRICK, individually
 and on behalf of all others similarly
 situated, and as representative of the
 State of California,

Plaintiff,

v.

SECURITAS SECURITY SERVICES
 USA, INC.,

Defendant.

Case No.: 3:13-cv-05016-JST

**JOINT STIPULATION AND
 [PROPOSED] ORDER TO CONTINUE
 MEDIATION DEADLINE AND CASE
 MANAGEMENT CONFERENCE**

[Concurrently filed with Declaration of
 Sherry B. Shavit pursuant to Local Rule 6-
 2]

1 **I. INTRODUCTION**

2 Pursuant to Civil Local Rules 6-1, 6-2 and 17-2, the undersigned counsels
3 hereby jointly request an order changing time for the purpose of conserving the time
4 and resources of the Court and the Parties. In particular, the deadline to complete
5 mediation in this matter is currently set for April 15, 2015 and the Case Management
6 Conference (“CMC”) is currently set for April 22, at 2:00 p.m. The Parties request
7 that the deadline to complete mediation be continued to April 22, 2015 and the CMC
8 be continued to April 29, 2015, at 2:00 p.m.

9 **II. THE REQUESTED ORDER TO CHANGE TIME IS APPROPRIATE**

10 Pursuant to Local Rule 6-2(a)(1), Parties filing a stipulation requesting an
11 order changing time that would affect the date of an event already fixed by Court
12 order must (1) set forth with particularity the reasons for the requested change, (2)
13 disclose all previous time modifications in the case, whether by stipulation or Court
14 order, and (3) describe the effect that the requested time modification would have on
15 the schedule for the case.

16 **A. Reasons for the Requested Relief**

17 The reason for the requested order is to promote efficiency and to conserve the
18 time and resources of the Court as well as the Parties. The reason for the requested
19 continuance of the deadline to complete mediation, is for the reason that the mediator
20 selected by the Parties, Gig Kyriacou, a highly regarded mediator for complex
21 employment-related disputes, such as in this case, is not available until April 22,
22 2015, and the parties have scheduled a mediation with him on that date.

23 Additionally, the Court originally scheduled the next CMC for April 15, 2015 as it
24 was originally anticipated that mediation would be completed by then. The Parties
25 believe that for the sake of efficiency and convenience of the Court, the CMC would
26 be more constructive after the mediation has been completed. Therefore, the Parties
27 request the CMC to be continued to April 29, 2015, at 2:00 p.m. to allow the Parties
28 to complete mediation prior to the CMC. - 2 -

1 **B. Previous Time Modifications**

2 Pursuant to Local Rule 6-2(a)(2), the Parties disclose that the previous time
3 modifications in this case have been: (1) continuing the Initial Case Management
4 Conference from January 28, 2014 to February 12, 2014 due to judicial reassignment
5 [ECF Doc. No. 10]; (2) continuing the Further Case Management Conference from
6 September 10, 2014, to September 17, 2014 upon the Court’s own request [ECF
7 Doc. No. 34]; (3) continuing the Further Case Management Conference by one day
8 from September 17, 2014 to September 18, 2014 pursuant to Stipulation and Order
9 [ECF Doc. No. 52]; and (4) continuing the deadline of August 22, 2014 to participate
10 in mediation to 45 days after the last date for putative class members to opt-in to the
11 FLSA collective action pursuant to Ex Parte Application and Order [ECF Doc. No.
12 51].

13 **C. Effect on Case Schedule**

14 Pursuant to Local Rule 6-2(a)(3), the requested time modification would have
15 minimal or no effect on the case schedule other than fostering efficiency and
16 convenience for the Court and the Parties. No other dates on the case schedule
17 would be affected by the requested modification.

18 **III. STIPULATION**

19 Plaintiff MICHAEL DEATRICK and Defendant SECURITAS SECURITY
20 SERVICES USA, INC., by and through their counsel of record, hereby stipulate to
21 continue the deadline to complete mediation currently set for April 15, 2015 to April
22 22, 2015, for the reason that the mediator, selected by the Parties, is not available
23 until April 22, 2015, and the parties have scheduled a mediation with him on that
24 date. Also, the Parties hereby stipulate to continue the CMC from April 15, 2015, at
25 2:00 p.m. to April 29, 2015, at 2:00 p.m., so that the Parties may complete mediation
26 prior to the CMC.

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THARPE & HOWELL, LLP
15250 Ventura Boulevard, Ninth Floor
Sherman Oaks, California 91403-3221

1 I, Sherry B. Shavit, am the ECF User whose identification and password are
2 being used to file this Stipulation. In compliance with Local Rule 5-1(i)(3), I attest
3 that all other signatories listed, and on whose behalf the filing is submitted, concur in
4 the filing's content and have authorized the filing.

5 IT IS SO STIPULATED.

7 Dated: February 4, 2015

THARPE & HOWELL, LLP

9 By: /s/Sherry B. Shavit
10 SHERRY B. SHAVIT
11 STUART E. COHEN

12 J. KEVIN LILLY
13 LITTLER MENDELSON PC
14 2049 Century Park East, 5th Floor
15 Los Angeles, CA 90067
16 Tel: (310) 553-0308
17 Fax: (310) 553-5583
18 Attorneys for Defendant,
19 SECURITAS SECURITY SERVICES,
20 USA, INC.

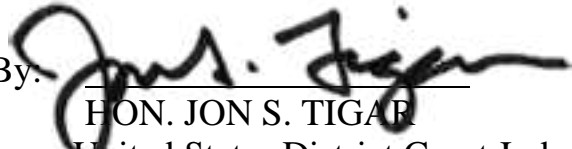
19 Dated: February 4, 2015

PROMETHEUS PARTNERS L.L.P

21 /s/ John R. Hurley
22 By: JOHN R. HURLEY
23 Attorneys for Plaintiff,
24 MICHEAL DEATRICK

24 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

25 Dated: February 5, 2015

26 By: 
27 HON. JON S. TIGAR
28 United States District Court Judge