

1 Michael W. Sobol (State Bar No. 194857)
 Nicole D. Reynolds (State Bar No. 246255)
 2 LIEFF CABRASER HEIMANN & BERNSTEIN LLP
 275 Battery Street, 29th Floor
 3 San Francisco, CA 94111
 Telephone: (415) 956-1000
 4 E-mail: msobol@lchb.com
 nreynolds@lchb.com

5 Daniel M. Hattis (State Bar No. 232141)
 6 HATTIS LAW
 1134 Crane Street, Suite 216
 7 Menlo Park, CA 94025
 Telephone: (650) 980-1990
 8 E-mail: dan@hattislaw.com

9 *Attorneys for Plaintiff*

10
 11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA
 13 SAN FRANCISCO DIVISION

14
 15 MARTIN BLAQMOOR, individually and
 on behalf of all others similarly situated,

16 Plaintiff,

17 v.

18 TRACFONE WIRELESS, INC.

19 Defendant.

Case No. 13-cv-05295-EMC

20
 21 **STIPULATION AND [PROPOSED]
 ORDER REGARDING SCHEDULE ON
 MOTION TO COMPEL ARBITRATION**

22 Pursuant to Local Rules 6-2 and 7-12, Plaintiff Martin Blaqmoor (“Plaintiff”) and
 23 Defendant TracFone Wireless, Inc. (“Defendant”), through their undersigned counsel, hereby
 stipulate as follows:

24 WHEREAS, on November 21, 2013, the Court related the above-entitled action to *Hansell*
 25 *v. TracFone Wireless, Inc.*, Case No. 13-cv-03440-EMC (N.D. Cal.) (the “*Hansell Action*”);

26 WHEREAS, on November 21, 2013, during the parties’ Initial Case Management
 27 Conference in the *Hansell Action*, the Court ordered the following schedule on the Motion to
 28 Compel Arbitration in the *Hansell Action*:

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

1. 12/19/13: Motion to Compel Arbitration Due;
2. 1/23/14: Opposition to Motion to Compel Arbitration Due;
3. 2/6/14: Reply in Support of Motion to Compel Arbitration Due;
4. 2/27/14 at 1:30 p.m.: Hearing on Motion to Compel Arbitration.

WHEREAS, on December 19, 2013, Defendant filed a Motion to Compel Arbitration in the *Hansell* Action, and also sought leave to file a Motion to Compel Arbitration in the above-entitled action and in another related case, entitled *Gandhi et al. v. TracFone Wireless, Inc.*, Case No. 13-cv-05296-EMC (N.D. Cal.);

WHEREAS, on December 20, 2013, the Court granted Defendant leave to file its Motion to Compel Arbitration in the above-entitled action (Dkt. No. 13), but didn't set a specific briefing schedule or a hearing for the motion;

WHEREAS, the parties have met and conferred and agree that the same briefing schedule set for the Motion to Compel Arbitration in the *Hansell* action should apply to this action;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, between Plaintiff, by his undersigned counsel, and Defendant, by its undersigned counsel, that the schedule on the arbitration motion in the *Hansell* Action also apply to this action, such that:

1. 1/23/14: Plaintiffs' Opposition to Motion to Compel Arbitration due;
2. 2/6/14: Defendant's Reply in Support of Motion to Compel Arbitration due;
3. 2/27/14 at 1:30 p.m.: Hearing on Motion to Compel Arbitration.

ORDER

Pursuant to Stipulation, it is so ORDERED.

Dated: 1/2/14, ~~2013~~



EDWARD M. CHEN
United States District Judge

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

Dated: December 27, 2013

Respectfully submitted,
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: /s/ Nicole D. Reynolds
Nicole D. Reynolds

Michael W. Sobol
msobol@lchb.com
Nicole D. Reynolds
nreynolds@lchb.com
LIEFF CABRASER HEIMANN & BERNSTEIN LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111
Telephone: (415) 956-1000

Daniel M. Hattis
dan@hattislaw.com
HATTIS LAW
1134 Crane Street, Suite 216
Menlo Park, CA 94025
Telephone: (650) 980-1990

Attorneys for Plaintiff

1 Dated: December 27, 2013

SIDLEY AUSTIN LLP

2
3
4
5 By: /s/ Joel S. Feldman
Joel S. Feldman

6 Joel S. Feldman (admitted *pro hac vice*)
7 jfeldman@sidley.com
8 Lisa E. Schwartz (admitted *pro hac vice*)
lschwartz@sidley.com
9 SIDLEY AUSTIN LLP
One South Dearborn Street
10 Chicago, Illinois 60603

11 Ryan M. Sandrock
rsandrock@sidley.com
12 555 California Street, Suite 2000
13 San Francisco, California 94104

14 Steven J. Brodie (*pro hac vice* to be submitted)
sbrodie@carltonfields.com
15 Aaron S. Weiss (*pro hac vice* to be submitted)
aweiss@carltonfields.com
16 CARLTON FIELDS, P.A.
17 Miami Tower
100 SE Second Street, Suite 4200
18 Miami, FL 33131-2119

19 *Attorneys for Defendant*

20
21 **ATTESTATION**

22 I, Nicole D. Reynolds, am the ECF user whose identification and password are being used
23 to file this Stipulation. I hereby attest that Joel S. Feldman has concurred in this filing.

24
25 /s/ Nicole D. Reynolds
Nicole D. Reynolds