

1 Thomas A. Kearney, State Bar No. 90045
 2 tak@kearneylittlefield.com
 3 Prescott W. Littlefield, State Bar No. 259049
 4 pwl@kearneylittlefield.com
 5 **KEARNEY LITTLEFIELD LLP**
 6 633 W. Fifth Street, 28th Floor
 Los Angeles, CA 90071
 Telephone (213) 473-1900
 Facsimile (213) 473-1919

7 Gene J. Stonebarger, State Bar No. 209461
 8 gstonebarger@stonebargerlaw.com
 9 Richard D. Lambert, State Bar No. 251148
 10 rlambert@stonebargerlaw.com
 11 Elaine W. Yan, State Bar No. 277961
 12 eyan@stonebargerlaw.com
 13 **STONEBARGER LAW**
 A Professional Corporation
 75 Iron Point Circle, Suite 145
 Folsom, CA 95630
 Telephone (916) 235-7140
 Facsimile (916) 235-7141

14 Attorneys for Plaintiff Mendez and the Class

15 **UNITED STATES DISTRICT COURT**
 16 **NORTHERN DISTRICT OF CALIFORNIA**

17
18 JAMIE MENDEZ, an individual, on behalf
19 of herself and all others similarly situated

20 Plaintiff,

21 v.

22 C-TWO GROUP, INC.; MOBILESO TRM,
23 INC.; and DOES 1-50, inclusive,

24 Defendants.
25

Case No.3:13-cv-05914-EMC

26 **STIPULATION TO CONTINUE CASE**
 27 **MANAGEMENT CONFERENCE AND**
 28 **[PROPOSED] ORDER**

Current Date: May 15, 2014
 Current Time: 9:00 a.m.
 Courtroom: 5, 17th Floor

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:
2 Plaintiff Jamie Mendez and Defendant C-Two Group, Inc., by and through their
3 respective counsel of record, hereby stipulate as follows:

4 WHEREAS, Plaintiff filed the Complaint in this Action in state court on November 5,
5 2013;

6 WHEREAS, the Summons and Complaint were served on Defendants on November 21,
7 2014;

8 WHEREAS, Defendants removed this Action to this Court on December 20, 2013;

9 WHEREAS, this Action was assigned to this Court on January 9, 2014;

10 WHEREAS, on March 11, 2014, this Court scheduled the Case Management Conference
11 for May 15, 2014;

12 WHEREAS, Defendant C-Two Group, Inc. filed an Answer to Plaintiff's First Amended
13 Class Action Complaint on March 14, 2014;

14 WHEREAS, the Court's Minutes from Defendant MobileStorm's Motion to Dismiss
15 advises the parties that the Court intends to discuss ADR options at the Case Management
16 Conference currently set for May 15, 2014;

17 WHEREAS, pursuant to the discussions between counsel, Plaintiff believes that it is
18 necessary to add additional parties that may be liable for some or all of Plaintiff's allegations in
19 the First Amended Class Action Complaint;

20 WHEREAS, Plaintiff is currently investigating the identities of all other potential parties
21 to this case in order to properly bring them before the Court prior to the Case Management
22 Conference;

23 WHEREAS, it is Plaintiff's belief that any discussion of ADR will be more productive
24 with all potentially liable parties before the Court;

25 ///
26 ///
27 ///
28 ///

1 IT IS HEREBY STIPULATED pursuant to Local Rule 7-12 and the Court's Civil
2 Standing Order that the Case Management Conference currently scheduled for May 15, 2014
3 shall be continued for 63 days, to Thursday, July 17, 2014 at 9:30 a.m.

4 Dated: April 25, 2014

KEARNEY LITTLEFIELD, LLP
STONEBARGER LAW, APC

6 By: /s/ Richard D. Lambert
7 Richard D. Lambert
8 Attorneys for Plaintiff and the Class

9 Dated: April 25, 2014

WALSWORTH, FRANKLIN, BEVINS &
McCALL, LLP

11 By: /s/ Laurie E. Sherwood
12 LAURIE E. SHERWOOD
13 ALEXANDER F. PEVZNER
14 Attorneys for Defendant
15 C-TWO GROUP, INC.

16 I, Richard D. Lambert, hereby attest that pursuant to LR 5-1(i) I have on file concurrence for
17 any signatures indicated by a "conformed" signature (/s/) within this e-filed document.

18 /s/ Richard D. Lambert
19 Richard D. Lambert

20
21 **~~PROPOSED~~ ORDER**

22 PURSUANT TO STIPULATION, IT IS SO ORDERED. (modified)

23 4/28/14

24 Dated: _____

