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10 Attorneys for Defendant
 AIR SERV CORPORATION (erroneously sued as
 11 "AIR SERV CORP.")

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

16 MARIO JAKOSALEM, on behalf of
 17 himself, and on behalf of others similarly
 18 situated, and the general public,

19 Plaintiff,

20 v.

21 AIR SERV CORP., and DOES 1 through
 22 50,

23 Defendants.

Case No. 3:13-cv-05944-SI

**STIPULATION AND ~~[PROPOSED]~~
 ORDER CONTINUING DEADLINES TO
 ALLOW FOR MEDIATION**

Complaint Filed: October 28, 2013

24 IT IS HEREBY STIPULATED by and between Plaintiff MARIO JAKOSALEM
 25 ("Plaintiff") and Defendant AIR SERV CORPORATION ("Defendant") (*collectively* the "Parties"),
 26 by and through their attorneys of record:

27 WHEREAS, on August 8, 2014 this Court held an initial Case Management
 28 Conference;

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STIPULATION AND ORDER CONTINUING
 DEADLINES

Case No. 3:13-cv-05944-SI

1 WHEREAS, at the initial Case Management Conference, the following dates were set
2 by the Court:

- 3 • December 8, 2014 - Deadline for Plaintiff to file Motion for Class
4 Certification;
- 5 • January 12, 2015 - Deadline for Defendant to file Opposition to Plaintiff's
6 Motion for Class Certification;
- 7 • January 26, 2015 - Deadline for Plaintiff to file a reply memorandum in
8 support of Motion for Class Certification; and
- 9 • February 13, 2015 at 9:00 a.m. - Hearing on Motion for Class Certification.

10 WHEREAS, the Parties have agreed to attend a mediation before Mark Rudy on
11 January 23, 2015 at 9:00 a.m. This was Mr. Rudy's first available date for mediation.

12 WHEREAS, in light of the timing of the mediation, the Parties agree that conducting
13 significant formal discovery and briefing the motion for class certification would be counter-
14 productive and would not encourage resolution of the matter. Accordingly, the Parties have agreed
15 to continue the relevant deadlines subject to Court approval. The parties have exchanged documents
16 and other information and will take any necessary depositions before the January 23, 2015 mediation
17 date.

18 NOW THEREFORE, IT IS HEREBY STIPULATED by and among the undersigned
19 Parties, through their counsel of record, as follows:

- 20 1. All currently scheduled dates, including the date for hearing on Plaintiff's
21 motion for class certification, are vacated pending the Parties January 2015 mediation.
- 22 2. The Parties (Plaintiff or Defendant individually or the Parties jointly) will
23 notify the Court within three days of reaching impasse so that new dates for class certification and
24 trial (and all related dates) can be set. If the case does not resolve, the Parties anticipate being ready
25 for certification by July 2015.
- 26 3. This Stipulation may be signed in counterparts.

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LIBERATION LAW GROUP, PC

DATED: October 23, 2014

By: /s/ Arlo Uriate Garcia
Arlo Uriarte Garcia
Attorney for Plaintiffs

LITTLER MENDELSON, P.C.

DATED: October 23, 2014

By: /s/ Michelle B. Heverly
Keith A. Jacoby
Michelle B. Heverly
Attorneys for Defendant

[PROPOSED] ORDER

It is so ordered.

DATED: ___ October 27, 2014



Honorable Susan Illston