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11 Attorneys for Plaintiff

12  
 13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION  
 15

16 KELLY WILSON,  
 17  
 18 Plaintiff,

19 vs.

20 THE WALT DISNEY COMPANY, DISNEY  
 21 ENTERPRISES, INC., WALT DISNEY  
 22 PICTURES, and WALT DISNEY MOTION  
 23 PICTURES GROUP, INC.,  
 24  
 25 Defendants.

Case No. 3:14-cv-01441-VC

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO MODIFY CASE  
 MANAGEMENT CONFERENCE,  
 HEARING AND RELATED DATES**

Judge: Hon. Vince G. Chhabria

1 Plaintiff Kelly Wilson (“Plaintiff”) and Defendants The Walt Disney Company; Disney  
2 Enterprises, Inc.; Walt Disney Pictures, and Walt Disney Motion Pictures Group, Inc.  
3 (“Defendants”), by and through their respective counsel of record, hereby declare and stipulate as  
4 follows:

5 WHEREAS, on May 12, 2014 the Court ordered that a Case Management Conference will  
6 be held in this case on June 27, 2014, and ordered the parties to file a Joint Case Management  
7 Statement and Proposed Case Management Order no later than seven calendar days before that  
8 conference;

9 WHEREAS, on June 2, 2014, Defendants moved to dismiss Plaintiff’s complaint and  
10 noticed the hearing on that motion for July 10, 2014 [Docket No. 22];

11 WHEREAS, pursuant to Civil Local Rule 6-2(a)(1), the parties state that the time  
12 modifications set forth below are requested for the following reason:

13 The parties have agreed to stipulate to modify the date of the hearing on the motion to  
14 dismiss because Plaintiff’s counsel is unavailable on July 10, 2014, and the Court is unavailable  
15 the following Thursday, July 17, 2104. The parties have further agreed to stipulate to modify the  
16 date of the Case Management Conference, subject to the Court’s schedule, to combine the hearing  
17 date on the motion to dismiss and the Case Management Conference.

18 WHEREAS, pursuant to Civil Local Rule 6-2(a)(2), the parties disclose that there has been  
19 one previous stipulated time modification in this case (May 6, 2014 [Docket No. 16]). This  
20 stipulation extended the deadline for the Defendants to answer or otherwise respond to Plaintiff’s  
21 complaint; and

22 WHEREAS, pursuant to Civil Local Rule 6-2(a)(3), the parties state that the requested  
23 time modifications herein will not affect any other aspect of the case schedule;

24 **ACCORDINGLY, THE PARTIES STIPULATE AS FOLLOWS:**

25 (1) The hearing on Defendants’ motion to dismiss will take place on July 24, 2014, at  
26 10:00 a.m.

27 (2) The Case Management Conference will take place on July 24, 2014, concurrently  
28 with the hearing on the motion to dismiss.

1 (3) The parties will meet and confer on the Joint Case Management Statement by July  
2 3, 2014, and will file a Joint Case Management Statement and [Proposed] Case Management  
3 Order by July 17, 2014, seven calendar days before the Case Management Conference.  
4 Defendants will discuss with Plaintiffs the case management issues set forth in the Standing Order  
5 for all Judges of the Northern District of California, but will request that initial disclosures  
6 pursuant to Rule 26 and discovery be stayed pending resolution of the motion to dismiss, in an  
7 effort to conserve party resources. Plaintiffs will meet and confer with Defendants on such  
8 request.

9 (4) The deadline for Plaintiff to file a brief in opposition to Defendants' motion to  
10 dismiss is extended to June 27, 2014.

11 (5) The deadline for Defendants to file a reply brief in support of their motion to  
12 dismiss is extended to July 10, 2014.

13 **IT IS SO STIPULATED.**

14

15 DATED: June 6, 2014

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J. PAUL GIGNAC  
MISCHA N. BARTEAU

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LAW OFFICE OF J.A. TED BAER  
J.A. TED BAER

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By:           /s/ J. Paul Gignac          

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J. PAUL GIGNAC

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Attorneys for Plaintiff

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DATED: June 6, 2014

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By:           /s/ Kelly M. Klaus          

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