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7 Attorneys for Defendants
 WYNDHAM VACATION OWNERSHIP, INC.,
 8 WYNDHAM WORLDWIDE CORP. AND
 WYNDHAM VACATION RESORTS, INC.
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10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION
 13

14 CHRIS MIORELLI, individually and as,
 Trustee of the MIORELLI FAMILY
 15 TRUST; TRINA, USA LLC.

16 Plaintiffs,

17 v.

18 WYNDHAM VACATION OWNERSHIP,
 INC., WYNDHAM WORLDWIDE
 19 CORPORATION, WYNDHAM
 VACATION RESORTS, INC., CHARLES
 20 BOWMAN, an individual, DOUGLAS
 PARK, an individual, and DOES 1 through
 21 50, inclusive.

22 Defendants.
 23

Case No. 3:14-cv-02073 CRB

**STIPULATION AND ORDER
 CONTINUING INITIAL CASE
 MANAGEMENT CONFERENCE AND
 ASSOCIATED DEADLINES**

Local Rule 6-1(b)

Current Conference Date: August 8, 2014
 Joint Statement Due: August 1, 2014

24 Pursuant to Civil Local Rule 6-1(b), the parties, by and through their attorneys of record,
 25 hereby agree and stipulate as follows:

26 (1) Defendants Wyndham Vacation Ownership, Inc., Wyndham Worldwide Corp. and
 27 Wyndham Vacation Resorts, Inc. (“Wyndham Defendants”) removed the above-captioned matter
 28 to this Court on May 6, 2014.

1 (2) On May 19, 2014, this Court entered its Case Management Conference Order
2 setting the Initial Case Management Conference for August 8, 2014, at 8:30 a.m. *See* Docket No.
3 10. Pursuant to this Order, the parties' Joint Case Management Statement is due August 1, 2014
4 (7 days prior to the Initial Case Management Conference). *Id.*

5 (3) On May 13, 2014, the Wyndham Defendants filed their Motion to Dismiss
6 Plaintiffs' Complaint. *See* Docket No. 7. On May 23, 2014, the Motion to Dismiss was set for
7 hearing in front of this Court on July 11, 2014, at 10:00 a.m. *See* Docket No. 11.

8 (4) On June 6, 2014, Plaintiffs filed a Motion to Remand. *See* Docket No. 13. This
9 motion is also set for hearing in front of this Court on July 11, 2014, at 10:00 a.m. *Id.*

10 (5) The parties have met and conferred and believe that it is in the best interest of
11 efficiency and economy to continue the Initial Case Management Conference and all associated
12 deadlines, including the deadline to file a Joint Case Management Statement, to allow for the
13 Court to hear arguments and issue a ruling on the pending Motion to Dismiss and Motion to
14 Remand.

15 (6) Good cause exists to continue the Initial Case Management Conference and the
16 associated deadlines as the Court's rulings on the pending motions has the potential to obviate
17 any need to conduct such a conference. Additionally, the Court's rulings on the pending motions
18 will likely impact the contents of the parties' Joint Case Management Statement.

19 (7) There are no other deadlines currently on calendar in this case that would be
20 affected by a continuance of the Initial Case Management Conference and the associated
21 deadlines.

22 (8) This is the parties' first request for a continuance of the Initial Case Management
23 Conference and the associated deadlines in this matter.

24 **IT IS SO STIPULATED.**

1 Dated: July 9, 2014

Schiff Hardin LLP

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By: /s/ Sarah D. Youngblood

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Rocky N. Unruh
Sarah D. Youngblood
Counsel for Defendants
WYNDHAM VACATION OWNERSHIP,
INC., WYNDHAM WORLDWIDE
CORP. and WYNDHAM VACATION
RESORTS, INC.

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Dated: July 9, 2014

Figari Law

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By: /s/ Barbara Figari

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Barbara Figari
Counsel for Plaintiffs
CHRIS MIORELLI, individually and as,
Trustee of the MIORELLI FAMILY
TRUST; TRINA, USA LLC.

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I attest and certify that I received permission from plaintiffs' counsel before e-filing this document and will retain proof of this permission.

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Dated: July 9, 2014

Schiff Hardin LLP

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By: /s/ Sarah D. Youngblood

17

Rocky N. Unruh
Sarah D. Youngblood
Counsel for Defendants
WYNDHAM VACATION OWNERSHIP,
INC., WYNDHAM WORLDWIDE
CORP. and WYNDHAM VACATION
RESORTS, INC.

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PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING, THE COURT ENTERS THE FOLLOWING ORDER:

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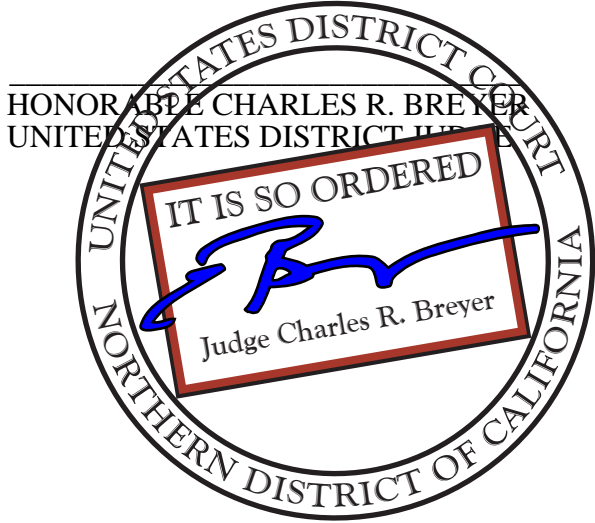
The August 8, 2014 Initial Case Management Conference is continued to August 22, 2014 at 10:00 a.m. in Courtroom 6 on the 17th floor of the Federal Building, 450 Golden Gate Avenue, San Francisco, California. All deadlines associated with the Initial

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1 Case Management Conference, including the deadline to file a Joint Case Management
2 Statement, shall be calculated based on the new date for the Initial Case Management Conference.

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4 Dated: July 10 _____, 2014



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