1 JOHN G. JACOBS (PRO HAC VICE) BRYAN G. KOLTON (PRO HAC VICE) 2 JACOBS KOLTON, CHTD. 55 West Monroe Street, Suite 2970 3 Chicago, Illinois 60603 Telephone: (312) 427-4000 Facsimile: (312) 268-2425 5 Email: jgjacobs@jacobskolton.com bgkolton@jacobskolton.com 6 Attorneys for Plaintiff Beverly Nunes 7 DAVID H. KRAMER, State Bar No. 168452 8 WILSON SONSINI GOODRICH & ROSATI 9 **Professional Corporation** 650 Page Mill Road 10 Palo Alto, CA 94304-1050 Telephone: (650) 493-9300 11 Facsimile: (650) 493-6811 Email: dkramer@wsgr.com 12 Attorneys for Defendant Twitter, Inc. 13 14 UNITED STATES DISTRICT COURT 15 NORTHERN DISTRICT OF CALIFORNIA 16 SAN FRANCISCO DIVISION 17 18 BEVERLY NUNES, individually and on behalf CASE NO.: 14-cv-02843-VC of a class of similarly situated individuals, 19 STIPULATION AND [PROPOSED] Plaintiff, **ORDER STAYING PROCEEDINGS** 20 AND MODIFYING CASE 21 **SCHEDULE** v. AS MODIFIED 22 TWITTER, INC., 23 Defendant. 24 25 26 27 28 STIPULATION AND [PROPOSED] ORDER REGARDING STAY AND SCHEDULE CASE No.: 14-CV-02843-VC

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1	On February 24, 2015, the parties in this matter participated in a mediation with the Hon.
2	Read Ambler, and agreed to further discussions and a further mediation session that is currently
3	scheduled to be conducted on March 24, 2015. In connection with their ongoing discussions, the
4	parties have jointly agreed to request a three-month stay of proceedings in this matter, along with
5	corresponding extensions to the existing case schedule. The parties' agreement and request for a
6	stay is made in good faith and not for purposes of delay.
7	
8	THE PARTIES THEREFORE STIPULATE through their undersigned counsel, subject
9	to the Court's approval, that:
10	1. All proceedings in this matter should be stayed through June 2, 2015;
11	2. The existing case schedule should be modified as follows: Phase I Discovery
12	completed by September 30, 2015; Initial Expert Witness statements shall be submitted
13	by October 17, 2015; Rebuttal Expert Witness statements shall be submitted by Novem-
14	ber 3, 2015; Motions for Summary Judgment on Phase 1 to be heard on February 19,
15	2016 10:00 a.m.
16	
17	DATE: March 3, 2015 /s/ David H. Kramer
18	David H. Kramer
19	WILSON SONSINI GOODRICH & ROSATI
20	Attorney for Defendant Twitter, Inc.
21	DATE: March 3, 2015 /s/ John G. Jacobs
22	John G. Jacobs (<i>PRO HAC VICE</i>) JACOBS KOLTON, CHTD
23	Jeffrey F. Keller KELLER GROVER, LLP
24	Attorneys for Plaintiff Beverly Nunes
25	Aubineys joi I minuji Deveny Ivanes
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STIPULATION AND [PROPOSED]
ORDER REGARDING STAY AND SCHEDULE
CASE NO.: 14-CV-02843-VC

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PURSUANT TO STIPULATION, AND GOOD CAUSE APPEARING, IT IS HEREBY **ORDERED THAT:**

- 1. All proceedings in this matter are stayed through June 2, 2015;
- 2. The existing case schedule is modified as follows: Phase I Discovery completed by September 30, 2015; Initial Expert Witness statements submitted by October 17, 2015; Rebuttal Expert Witness statements submitted by November 3, 2015; Motions for Summary Judgment on Phase 1 to be heard on February, 2016 10:00 a.m.

SIGNED this _____ day of March, 2015.

VINCE CHHABRIA UNITED STATES DISTRICT JUDGE

STIPULATION AND [PROPOSED] CASE No.: 14-CV-02843-VC