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Attorneys for Plaintiff JOHNNY WILLIAMS, Individually
and on behalf of all others similarly situated

UNITED STATE DISTRICT COURT**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

JOHNNY WILLIAMS,

Plaintiff,

vs.

HOL 'N JAM ENTERPRISES, LLC;
CENTERPLATE, INC.;
CENTERPLATE OF DELAWARE,
INC.; and DOES 1 through 100,
inclusive.

Defendants.

CASE NO.: 3:14-cv-02967-VC

**STIPULATION TO CHANGE THE
MOTION TO REMAND HEARING
DATE FROM SEPTEMBER 18, 2014
TO SEPTEMBER 25, 2014;
~~PROPOSED~~ ORDER**

Date: September 18, 2014

Time: 10:00 a.m.

Courtroom No.: 4

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

This Stipulation is entered into by and between Plaintiff, by and through his attorney of record Makarem & Associates, and Defendants Volume Services America Corporation d/b/a Centerplate and Volume Services, Inc. d/b/a Centerplate

1 (collectively referred to herein as “Volume Services”), by and through their attorneys
2 of record Barnes & Thornburg, LLP. This Stipulation is based on the following:

- 3 1. WHEREAS, Defendant Volume Services removed this case to federal
4 court on June 26, 2014.
- 5 2. WHEREAS, Defendant Hol ‘N Jam Enterprises, LLC has not formally
6 appeared in this case as of the time of this stipulation.
- 7 3. WHEREAS, Plaintiff filed a Motion to Remand on July 25, 2014. A
8 hearing on Plaintiff’s Motion to Remand has been scheduled for September
9 18, 2014.
- 10 4. WHEREAS, Plaintiff and Defendant Volume Services had not met and
11 conferred about the hearing date prior to the Motion for Remand being
12 filed, as required by Judge Chhabria’s Standing Order. The parties have
13 now met and conferred and have agreed to request that the hearing date for
14 Plaintiff’s Motion to Remand be rescheduled to September 25, 2014.
- 15 5. WHEREAS, the Parties respectfully request that this Court change the
16 hearing date for the Motion to Remand from September 18, 2014 to
17 September 25, 2014.

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1 IT IS HEREBY STIPULATED that the Parties jointly request this Court
2 change the hearing date for the Motion to Remand from September 18, 2014 to
3 September 25, 2014, or as soon thereafter as the Court finds convenient.
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5 Dated: August 5, 2014

MAKAREM & ASSOCIATES, APLC
MICHAEL H. KIM, PC

7 By: /s/ Jean-Paul Le Clercq /s/
8 JEAN-PAUL LE CLERCQ
9 Attorneys for Plaintiff
10 Johnny Williams

11
12 Dated: August 5, 2014

BARNES & THORNBURG LLP

13 By: /s/ Steve Hernandez /s/
14 Attorneys for Defendants
15 Volume Services America
16 Corporation d/b/a Centerplate
17 and Volume Services, Inc. d/b/a
18 Centerplate
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~~PROPOSED~~ ORDER

Having considered the Parties' Stipulation to Change the Motion to Remand Hearing Date the Court finds good cause to grant the relief requested.

IT IS HEREBY ORDERED that the hearing date for Plaintiff's Motion to Remand, currently scheduled for September 18, 2014, be rescheduled to September 25, 2014.

Dated: August 7, 2014



HON. VINCE CHHABRIA
SENIOR DISTRICT JUDGE