

COBLENTZ PATCH DUFFY & BASS LLP
ONE FERRY BUILDING, SUITE 200, SAN FRANCISCO, CALIFORNIA 94111-4213
415.391.4800 · FAX 415.989.1663

1 JONATHAN R. BASS (State Bar No. 75779)
CHARMAINE G. YU (State Bar No. 220579)
2 ALICE WANG (State Bar No. 289631)
COBLENTZ PATCH DUFFY & BASS LLP
3 One Ferry Building, Suite 200
San Francisco, California 94111-4213
4 Telephone: 415.391.4800
Facsimile: 415.989.1663
5 Email: ef-jrb@cpdb.com,
ef-cgy@cpdb.com

6 Attorneys for ALCO IRON & METAL CO.

7
8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10

11 PICK-N-PULL AUTO DISMANTLERS, a
12 California general partnership,

13
14 Plaintiff,

15 v.

16 ALCO IRON & METAL CO., a California
corporation; CESAR ZAMORA, an
individual; RICARDO ZAMORA, an
17 individual; EMILIO ZAMORA, an individual;
and DOES 1-25,

18 Defendants.
19

Case No. 3:14-CV-03275 VC

**STIPULATION AND ~~PROPOSED~~
ORDER ENLARGING TIME FOR
DISCOVERY CONFERENCE AND
INITIAL DISCLOSURES, AND INITIAL
CASE MANAGEMENT CONFERENCE
PURSUANT TO LOCAL RULE 6-2**

Judge: Hon. Vince Chhabria
Trial Date: None Set

20
21
22
23
24
25
26
27
28

1 WHEREAS Plaintiff Pick-N-Pull Auto Dismantlers ("Plaintiff") and Defendants Alco Iron
2 & Metal Co., Cesar Zamora, Ricardo Zamora, and Emilio Zamora (together, "Defendants," and
3 collectively with Plaintiff, the "Parties") previously stipulated to one prior extension of time,
4 whereby Defendants' time to answer or otherwise respond to the Complaint was extended to and
5 including September 22, 2014 [Dkt. 14];

6 WHEREAS that extension of time did not alter the date of any event or deadline currently
7 fixed by Court order;

8 WHEREAS the Parties are scheduled to mediate this dispute on October 7, 2014;

9 WHEREAS, in light of the scheduled mediation, Plaintiff and Defendants desire to extend
10 the dates set forth in the Court's Order Setting Initial Case Management Conference and ADR
11 Deadlines [Dkt. 7];

12 IT IS HEREBY STIPULATED and agreed to, by and among the undersigned, on behalf of
13 their respective clients, to enlarge the time regarding deadlines for the Federal Rule of Civil
14 Procedure 26 discovery conference and initial disclosures, and the initial case management
15 conference. The stipulated dates, and corresponding effect upon the current schedule, are as
16 follows:

- 17 **October 21, 2014** Last Day to:
- 18 (1) Meet and confer re: initial disclosures, early
 - 19 settlement, ADS process selection, and discovery
 - 20 plan;
 - 21 (2) File ADR Certification signed by Parties and Counsel
 - 22 (3) File either Stipulation to ADR Process or Notice
 - 23 Need for ADR Phone Conference

24 This stipulated date represents an extension of three weeks beyond the date currently
25 scheduled for these items.

- 26 **November 11, 2014** Last day to file Rule 26(f) Report, complete initial
27 disclosures or state objection in Rule 26(f) Report and file
28 Case Management Statement per Court's standing order re:
Contents of Joint Case Management Statement

29 This stipulated date represents an extension of four weeks beyond the date currently
30 scheduled for these items.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

November 18, 2014 Initial Case Management Conference in Courtroom 4, 17th Floor at 10:00 a.m.

This stipulated date represents an extension of four weeks beyond the date currently scheduled for the conference.

IT IS SO STIPULATED AND AGREED.

DATED: September 19, 2014 COBLENTZ PATCH DUFFY & BASS LLP

By: /s/Charmaine G. Yu
Charmaine G. Yu
Attorneys for ALCO IRON & METAL CO.

DATED: September 19, 2014 BERLINER COHEN

By: /s/Kathleen Sherman
Kathleen Sherman
Attorneys for PICK-N-PULL AUTO DISMANTLERS.

DATED: September 19, 2014 THE LAW OFFICES OF ERIK BABCOCK

By: /s/Erik Babcock
Erik Babcock
Attorneys for EMILIO ZAMORA.

DATED: September 19, 2014 THE LAW OFFICES OF PAUL M. WELLENKAMP

By: /s/Paul M. Wellenkamp
Paul M. Wellenkamp
Attorneys for CESAR ZAMORA.

DATED: September 19, 2014 BONJOUR, THORMAN, BARAY & BILLINGSLEY

By: /s/Michael Thorman
Michael Thorman
Attorneys for RICARDO ZAMORA.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

FILER'S ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Charmaine G. Yu, attest that concurrence in the filing of this **STIPULATION AND [PROPOSED] ORDER ENLARGING TIME FOR DISCOVERY CONFERENCE AND INITIAL DISCLOSURES, AND INITIAL CASE MANAGEMENT CONFERENCE PURSUANT TO LOCAL RULE 6-2** has been obtained from each of the other signatories.

Executed this 19th day of September, 2014, at San Francisco, California.

/s/Charmaine G. Yu
Charmaine G. Yu

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

~~PROPOSED~~ ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

DATED: September 23, 2014

