

1 JONATHAN D. WOLF, CA STATE BAR NO. 127043  
 KATHLEEN F. SHERMAN, CA STATE BAR NO. 241200  
 2 BERLINER COHEN  
 TEN ALMADEN BOULEVARD  
 3 ELEVENTH FLOOR  
 SAN JOSE, CALIFORNIA 95113-2233  
 4 TELEPHONE: (408) 286-5800  
 FACSIMILE: (408) 998-5388  
 5 jonathan.wolf@berliner.com  
 kathleen.sherman@berliner.com

6 ATTORNEYS FOR PLAINTIFF  
 7 PICK-N-PULL AUTO DISMANTLERS

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA

10 PICK-N-PULL AUTO DISMANTLERS, a  
 California general partnership,

11 Plaintiff,

12 v.

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

16 Defendants.

CASE NO. 3:14-cv-03275 VC

STIPULATION AND ~~PROPOSED~~ ORDER  
 TO ENLARGE TIME TO RESPOND TO  
 MOTIONS TO DISMISS

17  
 18 WHEREAS, the parties have agreed to participate in a mediation on October 7, 2014;  
 19 WHEREAS, Defendants have filed motions to dismiss pursuant to Fed.R.Civ.P. 12(b)(6),  
 20 with the hearing set for November 20, 2014;  
 21 WHEREAS, pursuant to Civ. L.R. 7-3(a), any response to the motions must be filed no later  
 22 than October 6, 2014;  
 23 WHEREAS, pursuant to Civ. L.R. 7-3(c), any replies must be filed no later than October 14,  
 24 2014;  
 25 WHEREAS, the parties are hopeful that the case can be settled in mediation and would like  
 26 to avoid incurring unnecessary attorneys' fees related to the motions to dismiss;  
 27 WHEREAS, the parties have previously stipulated to extend time to September 22, 2014 for  
 28 Defendants to file responsive pleadings, and the parties have previously stipulated to an enlargement

1 of time as to the dates set forth in the Court's Order Setting Initial Case Management Conference and  
2 ADR Deadlines, which the Court entered as an order on September 24, 2014; and

3 WHEREAS, the proposed enlargement of time will not affect the hearing date for the  
4 motions to dismiss, or any other aspect of the schedule for this case;

5 IT IS HEREBY STIPULATED and agreed to, by and among the undersigned, on behalf of  
6 their respective clients, to jointly request that the Court enlarge time and set a new briefing schedule  
7 for the motions to dismiss as follows:

- 8 1. The last date for filing any response brief be reset to October 27, 2014;
- 9 2. The last date for filing any reply brief be reset to November 6, 2014.

10 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

11  
12 DATED: SEPTEMBER 25, 2014

BERLINER COHEN

13 BY: /S/ KATHLEEN F. SHERMAN

JONATHAN D. WOLF

KATHLEEN F. SHERMAN

ATTORNEYS FOR PLAINTIFF

PICK-N-PULL AUTO DISMANTLERS

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17 Attestation of Consent to File:

COBLENTZ PATCH DUFFY & BASS LLP

18 BY: /S/ CHARMAINE G. YU

CHARMAINE G. YU

ATTORNEYS FOR ALCO IRON & METAL CO.

19 I, Kathleen F. Sherman, declare that  
20 Charmaine G. Yu gave me her  
21 permission to affix her electronic  
22 signature to this document.

*/s/ Kathleen F. Sherman*

23 Attestation of Consent to File:

THE LAW OFFICES OF ERIK BABCOCK

24 BY: /S/ ERIK BABCOCK

ERIK BABCOCK

ATTORNEYS FOR EMILIO ZAMORA

25 I, Kathleen F. Sherman, declare that Erik  
26 Babcock gave me his permission to affix  
27 his electronic signature to this document.

*/s/ Kathleen F. Sherman*

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THE LAW OFFICES OF PAUL M. WELLENKAMP

Attestation of Consent to File:

BY: /s/ PAUL M. WELLENKAMP

PAUL M. WELLENKAMP  
ATTORNEYS FOR CESAR ZAMORA

I, Kathleen F. Sherman, declare that Paul M. Wellenkamp gave me his permission to affix his electronic signature to this document.

*/s/ Kathleen F. Sherman*

BONJOUR, THORMAN, BARAY & BILLINGSLEY

Attestation of Consent to File:

BY: /s/ MICHAEL THORMAN

MICHAEL THORMAN  
ATTORNEYS FOR RICARDO ZAMORA

I, Kathleen F. Sherman, declare that Michael Thorman gave me his permission to affix his electronic signature to this document.

*/s/ Kathleen F. Sherman*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: September 26, 2014

