

1 Todd A. Seaver (SBN 271067)  
 Victor S. Elias (SBN 262269)  
 2 **BERMAN DEVALERIO**  
 One California Street, Suite 900  
 3 San Francisco, CA 94111  
 Telephone: (415) 433-3200  
 4 Facsimile: (415) 433-6282  
 Email: tseaver@bermandevalerio.com  
 5 velias@bermandevalerio.com

6 Julian Hammond (SBN 268489)  
 Ari Cherniak (SBN 290071)  
 7 **HAMMOND LAW, PC**  
 1829 Reisterstown Rd., Suite 410  
 8 Baltimore, MD 21208  
 Telephone: (310) 601-6766  
 9 Facsimile: (310) 295-2385  
 Email: jhammond@hammondlawpc.com  
 10 Email: acherniak@hammondlawpc.com

11 *Attorneys for Plaintiff Michael Savetsky*  
 12 *and the Putative Class*

13  
 14 **UNITED STATES DISTRICT COURT**  
 15 **NORTHERN DISTRICT OF CALIFORNIA**  
 16 **SAN FRANCISCO DIVISION**

17 MICHAEL SAVETSKY, individually and  
 18 on behalf of all others similarly situated,

19 Plaintiff,

20 v.

21 PRE-PAID LEGAL SERVICES, INC.,  
 dba LegalShield, an Oklahoma  
 Corporation,

22 Defendant.

Case No. 3:14-cv-03514-SC

CLASS ACTION

**STIPULATED REQUEST AND**  
~~**PROPOSED**~~ **ORDER REGARDING**  
**BRIEFING SCHEDULE AND**  
**HEARING DATE ON**  
**LEGALSHIELD'S MOTION TO**  
**COMPEL ARBITRATION**

**[LOCAL RULES 6-2 AND 7-12]**

Courtroom 1 – 17<sup>th</sup> Floor

The Hon. Samuel Conti

1           WHEREAS, on March 20, 2015, Defendant LegalShield filed a Motion to Compel  
2 Arbitration Under the Associate Agreement (“Motion to Compel Arbitration”) (ECF No. 40).  
3 That Motion is currently set for hearing on May 1, 2015 at 10:00 a.m.

4           WHEREAS, pursuant to the Court’s local rules, Plaintiff’s opposition to the Motion to  
5 Compel Arbitration is due on April 3, 2015 and Defendant’s reply on the Motion to Compel  
6 Arbitration is due on April 10, 2015. Civil L.R. 7-3 (a) & (c).

7           WHEREAS, Plaintiff’s counsel and counsel for Defendant LegalShield have conferred  
8 regarding the briefing schedule and hearing date on the Motion to Compel Arbitration.

9           WHEREAS, the parties seek a three-week extension of time to respond and reply to the  
10 Motion to Compel Arbitration because: (1) the Motion presents complex new fact averments by  
11 Defendant that are not part of plaintiff’s complaint and (2) the Motion requests relief that  
12 involves the interplay between multiple contracts and the Court’s previous order denying a  
13 motion to compel arbitration in this matter (ECF No. 33). To accommodate the extended  
14 briefing schedule, the parties further request that the hearing date be moved from May 1, 2015  
15 at 10:00 a.m. to May 29, 2015 at 10:00 a.m. (a date which Plaintiff’s counsel has previously  
16 confirmed is an available hearing date for the Court).

17           WHEREAS, no other dates have been set that would be adversely impacted by this short  
18 extension.

19           **Prior Continuances**

20           WHEREAS, on October 16, 2014, Defendant LegalShield filed an Administrative  
21 Motion for Relief from Case Management Schedule (ECF No. 19), which the Court granted,  
22 moving the initial Case Management Conference (“CMC”) to January 30, 2015 and resetting  
23 related deadlines accordingly (ECF No. 20).

24           WHEREAS, on January 9, 2015, the parties submitted a Stipulated Administrative  
25 Motion for Relief from Case Management Schedule (ECF No. 28), which the Court granted,  
26 moving the initial CMC to February 20, 2015, and continuing the Rule 26 deadlines accordingly  
27 (ECF No. 29).

28           WHEREAS, on February 6, 2015, the parties submitted a Stipulated Administrative

1 Motion for Relief from Case Management Schedule (ECF No. 30), which the Court granted,  
2 moving the initial CMC to April 17, 2015, and continuing the Rule 26 deadlines accordingly  
3 (ECF No. 31).

4 WHEREAS, the Court granted the above requests to allow more time to rule on the  
5 initial Motion to Compel Arbitration.

6 **Effect on Case Schedule**

7 WHEREAS, the parties' request for a change in the hearing date on the motion to  
8 compel and corresponding enlargement of time on the briefing schedule does not require  
9 changes to the ADR process or other known deadlines in this case.

10  
11 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

12 Dated: March 30, 2015

**HAMMOND LAW, PC**

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14 By: s/ Ari Cherniak  
Ari Cherniak

15 1829 Reisterstown Rd., Suite 410  
16 Baltimore, MD 21208  
17 Telephone: (310) 601-6766  
Facsimile: (310) 295-2385  
Email: acherniak@hammondlawpc.com

18 *Attorneys for Plaintiff Michael Savetsky*  
19 *and the Putative Class*

20 Dated: March 27, 2015

**SHEPPARD, MULLIN, RICHTER &  
HAMPTON LLP**

21  
22 By: s/ Shannon Z. Petersen  
Shannon Z. Petersen

23 Four Embarcadero Center, 17th Floor  
24 San Francisco, California 94111-4109  
25 Telephone: 415.434.9100  
Facsimile: 415.434.3947  
Email: spetersen@sheppardmullin.com

26 *Attorneys for Defendant Pre-Paid Legal Services,*  
27 *Inc., now known as Legalshield*

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**E-Filing Attestation**

I, Ari Cherniak, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Shannon Z. Peterson has concurred in and authorized this filing.

s/ Ari Cherniak  
Ari Cherniak

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~~PROPOSED~~ ORDER

Pursuant to the stipulation of the parties and and good cause being shown, **IT IS ORDERED** that:

(1) the hearing on LegalShield’s Motion to Compel Arbitration Under the Associate Agreement (“Motion to Compel Arbitration”) (ECF No. 40), currently scheduled for May 1, 2015, is continued until May 29, 2015 at 10:00 a.m.;

(2) the deadline for Plaintiff’s opposition to the Motion to Compel Arbitration currently scheduled for April 3, 2015, is continued until April 24, 2015; and

(3) the deadline for LegalShield’s reply on the Motion to Compel Arbitration currently scheduled for April 10, 2015, is continued until May 8, 2015.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: 03/31/2015

