

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

KRONENBERGER ROSENFELD, LLP
Karl S. Kronenberger (Bar No. 226112)
Jeffrey M. Rosenfeld (Bar No. 222187)
Conor H. Kennedy (Bar No. 281793)
150 Post Street, Suite 520
San Francisco, CA 94108
Telephone: (415) 955-1155
Facsimile: (415) 955-1158
karl@KRInternetLaw.com
jeff@KRInternetLaw.com
conor@KRInternetLaw.com

Attorneys for Plaintiff
SA Luxury Expeditions LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

SA LUXURY EXPEDITIONS LLC, a
California limited liability company,

Plaintiff,

v.

LATIN AMERICA FOR LESS, LLC, a
Texas limited liability company;
BERNARD SCHLEIEN, an individual,
AKA Jose Castellon; and **DOES 1-10**,
inclusive,

Defendants.

Case No. 3:14-cv-04085-WHA

**STIPULATION AND ~~PROPOSED~~
ORDER RE. DISCOVERY DISPUTES**



150 Post Street, Suite 520, San Francisco, CA 94108



1 WHEREAS, on November 24, 2014, Defendant Latin America For Less, LLC
2 ("LAFL" or "Defendant") filed its discovery letter brief regarding the dates, times, and
3 locations of depositions of Plaintiff SA Luxury Expeditions LLC ("Plaintiff")'s founders and
4 an employee [D.E. No. 39];

5 WHEREAS, on November 25, 2014, Plaintiff filed its discovery letter brief
6 requesting that the Court enter this District's stipulated protective order [D.E. No. 41];

7 WHEREAS, in separate orders, the Court set a two-hour meet-and-confer and
8 discovery hearing on Defendant's and Plaintiff's discovery matters for December 1, 2014
9 and ordered that any responses to the parties' discovery letters be filed by 2:00 p.m. on
10 November 28, 2014 [D.E. Nos. 40 and 43];

11 WHEREAS, the parties have resolved their discovery disputes regarding both: a)
12 the depositions of Plaintiff's founders and an employee, and b) the request for the entry
13 of a stipulated protective order; and

14 WHEREAS, the parties respectfully request that the Court vacate the meet-and-
15 confer and discovery hearing on December 1.

16
17 Respectfully submitted,

18 DATED: November 26, 2014

DATED: November 26, 2014

19 **KRONENBERGER ROSENFELD, LLP**

RAMEY & BROWNING, PLLC

20
21 By: s/ Jeffrey M. Rosenfeld
Jeffrey M. Rosenfeld

By: s/ Harry Laxton, Jr.
Harry Laxton, Jr.

22 Attorneys for Plaintiff

Attorneys for Defendant Latin America For
23 Less, LLC

24
25 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

26 Based on the parties' representations, the December 1 hearing is
hereby vacated.

27 Date: November 27, 2014.

The Hon. William Alsup
District Court Judge

28