

1 KIMBERLY AROUH (Cal. Bar No. 163285)
 kimberly.arouh@bipc.com
 2 BUCHANAN INGERSOLL & ROONEY LLP
 One America Plaza
 3 600 West Broadway, Suite 1100
 San Diego, CA 92101
 4 Telephone: 619 239 8700
 Fax: 619 702 3898

5 Attorney for Defendant
 6 Wigzi, LLC

7 [Additional Stipulating Counsel in Signature Block]

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

11 Diane Ellen Quintero and
 12 Omar Alberto Quintero-Carmona,
 13 Plaintiffs,
 14 vs.
 15 Wigzi, LLC,
 16 Defendant.

Case No. 3:14-cv-04602-SI

**STIPULATION AND JOINT REQUEST
 FOR CONTINUANCE OF CASE
 MANAGEMENT CONFERENCE AND
 EXTENSION OF INITIAL DEADLINES;
 [PROPOSED] ORDER**

Judge: Honorable Susan Illston

17
 18
 19 Pursuant to Civil Local Rules 5, 6-1(a), 7-12 and 16-2, Defendant Wigzi, LLC
 20 (“Defendant”) and Plaintiffs Diane Ellen Quintero and Omar Alberto Quintero-Carmona
 21 (collectively, “Plaintiffs”), by and through their respective counsel, hereby stipulate as follows:

22 WHEREAS, this Court has set the Initial Case Management Conference in the above-
 23 captioned action for January 23, 2015 at 2:30 p.m.;

24 WHEREAS, the parties have previously jointly stipulated to extend the time for Defendant
 25 to answer or otherwise respond to Plaintiffs’ Complaint to February 2, 2015;

26 WHEREAS, in order that the parties may focus on ongoing settlement discussions, and to
 27 promote judicial economy and allow sufficient time for the parties to meaningfully meet and confer
 28


1 on all topics required by Fed. R. Civ. P. 26, the Civil Local Rules, and the Court's Standing Orders,
2 the parties believe that it is appropriate to continue the Initial Case Management Conference for a
3 period of one month or more after the date for Defendant to answer or otherwise respond;

4 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties, through
5 their respective counsel, to jointly request a continuance of the Initial Case Management
6 Conference to **March 6, 2015 at 2:30 p.m.** or such other date as is available to the Court, with all
7 other deadlines set forth in the Court's Order Setting Initial Case Management Conference and/or
8 required under the Federal Rules to be continued accordingly.

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

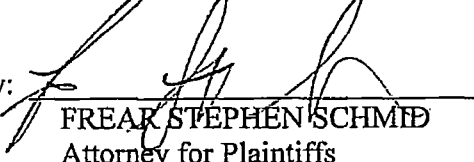
Dated: December 3, 2014

BUCHANAN INGERSOLL & ROONEY LLP

By: 
KIMBERLY AROUH
Attorney for Defendant
Wigzi, LLC

Dated: December 2, 2014

FREAR STEPHEN SCHMID, ESQ.

By: 
FREAR STEPHEN SCHMID
Attorney for Plaintiffs
Diane Ellen Quintero and
Omar Alberto Quintero-Carmona

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

ORDER

BASED ON THE PARTIES' STIPULATION, THE COURT'S FILE, AND GOOD CAUSE SHOWN, THE COURT ORDERS AS FOLLOWS:

The Initial Case Management Conference and Rule 26 deadlines are continued as follows:

Event	Date
- Deadline to meet and confer re: initial disclosures, early settlement and discovery plan.	February 13, 2015
- Deadline to file Rule 26(f) Report, complete initial disclosures or state objections in Rule 26(f) Report, and file Case Management Statement per Standing Order re Contents of Joint Case Management Statement.	February 27, 2015
- INITIAL CASE MANAGEMENT CONFERENCE (CMC) in Courtroom 10, 19 th Floor, Philip Burton Federal Building, San Francisco.	13 March 6 , 2015 at 2:30 p.m.

IT IS SO ORDERED.

Dated: December 3, 2014



By: _____

The Honorable Susan Illston
Senior U.S. District Judge
For the Northern District of California