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5 Attorneys for Defendant
6 COUNTY OF SAN MATEO

7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 NANCY NIEVES,

11 Plaintiff,

12 vs.

13 COUNTY OF SAN MATEO, ET AL.,

14 Defendant

Case No. CV 14-05160 VC

**JOINT STIPULATION FOR REQUEST
FOR ORDER CONTINUING INITIAL
CASE MANAGEMENT CONFERENCE
AND ~~PROPOSED~~ ORDER**

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16 The parties in this matter, Plaintiff Nancy Nieves and Defendant County of San Mateo, hereby
17 submit this Joint Stipulated Request for Order Continuing Initial Case Management Conference,
18 currently scheduled for March 10, 2015. The parties request a new date for the Initial Case Management
19 Conference approximately 90 days out from the current date of March 10, 2015 for the following
20 reasons:

- 21 1. The parties are currently discussing settlement and exchanging informal discovery;
- 22 2. Because this is an action under the Fair Labor Standards Act Plaintiff has requested
23 attorneys' fees if she prevails on the merits of the case. In order to facilitate more effective settlement
24 discussions, the parties seek to avoid incurring unnecessary attorneys' fees at this time;
- 25 3. The parties seek to serve the interests of judicial economy and eliminate any unnecessary
26 burdens on the parties by postponing the Initial Case Management Conference and all deadlines that
27 accompany it such as the filing of a Joint Initial Case Management Statement until after the parties
28 conclude their initial settlement discussions. The Initial Case Management Statement is currently due on

1 March 3, 2015 but would be continued along with the Conference.

2 4. A continuance of 90 days will provide the parties with sufficient time to exchange formal
3 discovery and, if a settlement is reached, negotiate its terms and seek any necessary approval from
4 Defendant's governing body.

5 Dated: February 26, 2015.

Respectfully submitted,

6 JOHN C. BEIERS, COUNTY COUNSEL

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8 By: _____/s/_____
9 Daniel J. Valim, Deputy
10 Attorneys for Defendant
11 COUNTY OF SAN MATEO

12 Dated: February 26, 2015.

JASON M. ELRICH,
MCCORMACK & ELRICH, LLP

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14 By: _____/s/_____
15 Jason M. Erlich, Esq.
16 Attorneys for Plaintiff
17 NANCY NIEVES

18 **GOOD CAUSE APPEARING, AND PURSUANT TO STIPULATION, IT IS SO**

19 **ORDERED:**

20 The Court hereby grants the stipulated request of the parties and sets a new date for the Initial
21 Case Management Conference of June 9, 2015, at 10:00 a.m. All deadlines accompanying the
22 Initial Case Management Conference, such as the Initial Case Management Statement are continued to
23 the corresponding date as defined by statute.

24
25 Dated: March 2, 2015

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27 _____
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