

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

KEVIN BREAZEALE, KAREN SOLBERG,  
KEVIN HIEP VU, NANCY MORIN, and  
NARISHA BONAKDAR, on their own behalf  
and on behalf of others similarly situated,

Plaintiffs,

v.

VICTIM SERVICES, INC., d/b/a  
CorrectiveSolutions, NATIONAL  
CORRECTIVE GROUP, INC., d/b/a  
CorrectiveSolutions, and MATS JONSSON,

Defendants.

NO. 3:14-cv-05266-VC

**STIPULATION AND ~~PROPOSED~~  
ORDER EXTENDING BRIEFING  
DEADLINES**

Honorable Vince Chhabria

CLASS ACTION

**DEMAND FOR TRIAL BY JURY**

**I. STIPULATION**

The parties have stipulated and request that the Court extend the briefing deadlines for Defendants’ Special Motion to Strike (Dkt. No. 37) and Motion to Dismiss (Dkt. No. 38). Civil LR 7-12. Plaintiffs request a one-week extension of the time for them to respond to Friday, May 8, 2015. The parties have agreed that Defendants’ replies should be due two weeks later, on Friday May 22, 2015.

The motions are noticed for hearing on July 2, 2015. If the parties’ requested extensions are granted, the motions will be fully briefed forty-one days before the hearing date.

Plaintiffs requested and Defendants agreed to an extension of time to respond because both motions are dispositive motions of significant substance. Plaintiffs are working diligently to respond to the motions but request an additional week to prepare their responses to the forty-

1 seven pages of briefing filed by Defendants. The parties have agreed that Defendants should be  
2 granted an additional week to file their replies as well. The parties do not anticipate that the  
3 proposed extension of the briefing deadlines will require the Court to reset the hearing date for  
4 the motion or any other deadline.

5 IT IS SO STIPULATED.

6 RESPECTFULLY SUBMITTED AND DATED this 29th day of April, 2015.

7  
8 TERRELL MARSHALL DAUDT  
& WILLIE PLLC

FREEDMAN & TAITELMAN, LLP

9 By: /s/ Beth E. Terrell, CSB #178181  
10 Beth E. Terrell, CSB #178181  
11 Email: bterrell@tmdwlaw.com  
12 936 North 34th Street, Suite 300  
13 Seattle, Washington 98103-8869  
14 Telephone: (206) 816-6603  
15 Facsimile: (206) 350-3528

By: /s/ Michael A. Taitelman, CSB #156254  
16 Michael A. Taitelman, CSB #156254  
17 Email: mtaitelman@ftllp.com  
18 Sean M. Hardy, CSB #266446  
19 Email: smhardy@ftllp.com  
20 1901 Avenue of the Stars, Suite 500  
21 Los Angeles, California 90067  
22 Telephone: (310) 201-0005  
23 Facsimile: (310) 201-0045

24 Paul Arons  
25 Email: lopa@rockisland.com  
26 LAW OFFICE OF PAUL ARONS  
27 685 Spring Street, Suite 104  
Friday Harbor, Washington 98250  
Telephone: (360) 378-6496  
Facsimile: (360) 378-6498

*Attorneys for Defendants Victim Services,  
Inc., National Corrective Group, Inc., and  
Mats Jonsson*

Deepak Gupta  
Email: deepak@guptabeck.com  
GUPTA BECK PLLC  
1735 20th Street, NW  
Washington, DC 20009  
Telephone: (202) 888-1741  
Facsimile: (202) 888-7792

*Attorneys for Plaintiffs*

1 **II. ~~PROPOSED~~ ORDER**

2 PURSUANT TO STIPULATION, IT IS SO ORDERED. Plaintiffs' responses to  
3 Defendants' Special Motion to Strike (Dkt. No. 37) and Motion to Dismiss (Dkt. No. 38) shall be  
4 due on Friday, May 8, 2015. Defendants' replies shall be due on Friday May 22, 2015.

5 DATED this 30 day of April, 2015.

6 

7  
8 

---

THE HONORABLE VINCE CHHABRIA

9 Presented by:

10 TERRELL MARSHALL DAUDT  
11 & WILLIE PLLC

12 By: /s/ Beth E. Terrell, CSB #178181

13 Beth E. Terrell, CSB #178181  
14 Email: bterrell@tmdwlaw.com  
15 936 North 34th Street, Suite 300  
16 Seattle, Washington 98103-8869  
Telephone: (206) 816-6603  
Facsimile: (206) 350-3528

17 Paul Arons  
18 Email: lopa@rockisland.com  
19 LAW OFFICE OF PAUL ARONS  
20 685 Spring Street, Suite 104  
21 Friday Harbor, Washington 98250  
Telephone: (360) 378-6496  
Facsimile: (360) 378-6498

22 Deepak Gupta  
23 Email: deepak@guptabeck.com  
24 GUPTA BECK PLLC  
25 1735 20th Street, NW  
Washington, DC 20009  
Telephone: (202) 888-1741  
Facsimile: (202) 888-7792

26 *Attorneys for Plaintiffs*

1 FREEDMAN & TAITELMAN, LLP

2 By: /s/ Michael A. Taitelman, CSB #156254

3 Michael A. Taitelman, CSB #156254

4 Email: mtaitelman@ftllp.com

5 Sean M. Hardy, CSB #266446

6 Email: smhardy@ftllp.com

7 1901 Avenue of the Stars, Suite 500

8 Los Angeles, California 90067

9 Telephone: (310) 201-0005

10 Facsimile: (310) 201-0045

11 *Attorneys for Defendants Victim Services,*  
12 *Inc., National Corrective Group, Inc., and*  
13 *Mats Jonsson*