Ī			
1			
2			
3			
4			
5			
6			
7	U.S. DISTRIC	CT COURT	
8	NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION		
9	KEVIN BREAZEALE, KAREN SOLBERG,		
10	KEVIN HIEP VU, NANCY MORIN, and	NO. 3:14-cv-05266-VC	
11	NARISHA BONAKDAR, on their own behalf and on behalf of others similarly situated,	STIPULATION AND [PROPOSED]	
12	Plaintiffs,	ORDER EXTENDING CASE MANAGEMENT CONFERENCE	
13	v.	AS MODIFIED	
14	VICTIM SERVICES, INC., d/b/a	Honorable Vince Chhabria	
15	CorrectiveSolutions, NATIONAL	CLASS ACTION	
16	CORRECTIVE GROUP, INC., d/b/a CorrectiveSolutions, and MATS JONSSON,	DEMAND FOR TRIAL BY JURY	
17	Defendants.	DEMAND FOR TRIAL BY SURT	
18			
19			
20			
21	I. STIPU	ULATION	
22	The parties have stipulated and request that the Court extend the Case Management		
23	Conference and deadline to submit the joint case management statement. The Case		
24	Management Conference is currently set for May 14, 2015 and the deadline to submit the joint		
25	case management statement is May 7, 2015. See Dkt. No. 19.		
26			
27			
	STIPULATION AND [PROPOSED] ORDER EXTENDING CASE MANAGEMENT CONFERENCE - 1 CASE No. 3:14-cv-05266-VC TERRELL MARSHALL DAUDT & WILLIE PLLC 936 North 34th Street, Suite 300 Seattle, Washington 98103-8869 TEL. 206.816.6603 • FAX 206.350.3528 www.tmdwlaw.com		

1	The parties had agree to stay certain d	leadlines to discuss the possibility of early	
2	settlement and therefore have not yet conducted a Rule 26(f) conference. While settlement		
3	discussions are continuing, the parties will hold a Rule 26(f) conference to occur before Friday,		
4	May 15, 2015. In addition, Defendants have filed multiple motions which are scheduled for		
5	consideration on July 2, 2015. <i>See</i> Dkt. Nos.	37 and 38. The parties therefore request the Case	
6	•	y 2, 2015 and the deadline to submit the joint case	
7			
8	management report be continued to May 22, 2015.		
9	IT IS SO STIPULATED		
	RESPECTFULLY SUBMITTED AN	D DATED this 7th day of May, 2015.	
1011	TERRELL MARSHALL DAUDT & WILLIE PLLC	FREEDMAN & TAITELMAN, LLP	
12			
13	By: <u>/s/ Beth E. Terrell, CSB #178181</u> Beth E. Terrell, CSB #178181	By: /s/ Michael A. Taitelman, CSB #156254 Michael A. Taitelman, CSB #156254	
14	Email: bterrell@tmdwlaw.com	Email: mtaitelman@ftllp.com	
15	936 North 34th Street, Suite 300 Seattle, Washington 98103-8869	Sean M. Hardy, CSB #266446 Email: smhardy@ftllp.com	
16	Telephone: (206) 816-6603 Facsimile: (206) 350-3528	1901 Avenue of the Stars, Suite 500 Los Angeles, California 90067 Telephone: (310) 201-0005	
17	Paul Arons	Facsimile: (310) 201-0045	
18	Email: lopa@rockisland.com LAW OFFICE OF PAUL ARONS	Attorneys for Defendants Victim Services,	
19	685 Spring Street, Suite 104	Inc., National Corrective Group, Inc., and	
20	Friday Harbor, Washington 98250 Telephone: (360) 378-6496	Mats Jonsson	
21	Facsimile: (360) 378-6498		
22	Deepak Gupta		
	Email: deepak@guptabeck.com GUPTA BECK PLLC		
23	1735 20th Street, NW		
24	Washington, DC 20009 Telephone: (202) 888-1741		
25	Facsimile: (202) 888-7792		
26	Attorneys for Plaintiffs		
27			

II. **PROPOSED**] **ORDER** AS MODIFIED 1 2 PURSUANT TO STIPULATION, IT IS SO ORDERED. The Case Management 3 Conference shall be continued to July 2, 2015 and the deadline to submit the joint case June 25 4 management report shall be continued to May 22, 2015. 5 DATED this 8th day of May, 2015. 6 7 THE HONORABLE VINCE CHHABRIA 8 9 Presented by: 10 TERRELL MARSHALL DAUDT 11 & WILLIE PLLC 12 By: /s/ Beth E. Terrell, CSB #178181 Beth E. Terrell, CSB #178181 13 Email: bterrell@tmdwlaw.com 14 936 North 34th Street, Suite 300 Seattle, Washington 98103-8869 15 Telephone: (206) 816-6603 Facsimile: (206) 350-3528 16 Paul Arons 17 Email: lopa@rockisland.com 18 LAW OFFICE OF PAUL ARONS 685 Spring Street, Suite 104 19 Friday Harbor, Washington 98250 Telephone: (360) 378-6496 20 Facsimile: (360) 378-6498 21 Deepak Gupta 22 Email: deepak@guptabeck.com **GUPTA BECK PLLC** 23 1735 20th Street, NW Washington, DC 20009 24 Telephone: (202) 888-1741 Facsimile: (202) 888-7792 25 26 Attorneys for Plaintiffs

27

## PREEDMAN & TAITELMAN, LLP By: s Michael A. Taitelman. CSB #156254 Michael A. Taitelman. CSB #156254 Email: mtaitelman@ftllp.com Sean M. Hardy, CSB #266446 Email: smhardy @ftllp.com 1901 Avenue of the Stars, Suite 500 Los Angeles, California 90067 Telephone: (310) 201-0005 Facsimile: (310) 201-0005 Facsimile: (310) 201-0045 Attorneys for Defendants Victim Services, Inc., National Corrective Group, Inc., and Mats Jonsson Mats Jonsson 10		
By:		FREEDMAN & TAITELMAN, LLP
Michael A. Taitelman, CSB #156254	2	By: /s/ Michael A. Taitelman, CSB #156254
Sean M. Hardy, CSB #266446 Email: smhardy@ftllp.com 1901 Avenue of the Stars, Suite 500 Los Angeles, California 90067 Telephone: (310) 201-0005 Facsimile: (310) 201-0045 Attorneys for Defendants Victim Services, Inc., National Corrective Group, Inc., and Mats Jonsson Attorneys for Defendants Victim Services, Inc., National Corrective Group, Inc., and Mats Jonsson 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26	3	Michael A. Taitelman, CSB #156254
1901 Avenue of the Stars, Suite 500 Los Angeles, California 90067 Telephone: (310) 201-0005 Facsimile: (310) 201-0045 Attorneys for Defendants Victim Services, Inc., National Corrective Group, Inc., and Mats Jonsson 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26	4	
Los Angeles, California 90067 Telephone: (310) 201-0005 Facsimile: (310) 201-0045 Attorneys for Defendants Victim Services, Inc., National Corrective Group, Inc., and Mats Jonsson 10	5	
Facsimile: (310) 201-0045 Attorneys for Defendants Victim Services, Inc., National Corrective Group, Inc., and Mats Jonsson Attorneys for Defendants Victim Services, Inc., National Corrective Group, Inc., and Mats Jonsson 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26	6	Los Angeles, California 90067
Attorneys for Defendants Victim Services, Inc., National Corrective Group, Inc., and Mats Jonsson Attorneys for Defendants Victim Services, Inc., National Corrective Group, Inc., and Mats Jonsson 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26	7	
9	8	
10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26	9	Inc., National Corrective Group, Inc., and
12 13 14 15 16 17 18 19 20 21 22 23 24 25 26	10	Mats Jonsson
13 14 15 16 17 18 19 20 21 22 23 24 25 26	11	
14 15 16 17 18 19 20 21 22 23 24 25 26	12	
15 16 17 18 19 20 21 22 23 24 25 26	13	
16 17 18 19 20 21 22 23 24 25 26	14	
17 18 19 20 21 22 23 24 25 26	15	
18 19 20 21 22 23 24 25 26	16	
19 20 21 22 23 24 25 26	17	
19 20 21 22 23 24 25 26		
20 21 22 23 24 25 26		
 21 22 23 24 25 26 		
 22 23 24 25 26 		
 23 24 25 26 		
242526		
2526		
26		
-·	27	

	CERTIFICATE OF CERVICE			
1	<u>CERTIFICATE OF SERVICE</u>			
2	I, Beth E. Terrell, hereby certify that on May 7, 2015, I electronically filed the			
3	foregoing with the Clerk of the Court using the CM/ECF system which will send notification of			
4	such filing to the following:			
5	Michael A. Taitelman, CSB #156254			
6 7	Email: mtaitelman@ftllp.com Sean M. Hardy, CSB #266446 Email: smhardy@ftllp.com			
8	FREEDMAN & TAITELMAN, LLP 1901 Avenue of the Stars, Suite 500 Los Angeles, California 90067 Telephone: (310) 201-0005			
9				
10	Facsimile: (310) 201-0045			
11 12	Attorneys for Defendants Victim Services, Inc., National Corrective Group, Inc., and Mats Jonsson			
13	DATED this 7th day of May, 2015.			
14	TERRELL MARSHALL DAUDT & WILLIE PLLC			
15	By: /s/ Beth E. Terrell, CSB #178181			
16	Beth E. Terrell, CSB #178181 Email: bterrell@tmdwlaw.com			
17	936 North 34th Street, Suite 300			
18	Seattle, Washington 98103-8869 Telephone: (206) 816-6603			
19	Facsimile: (206) 350-3528			
20	Attorneys for Plaintiff			
21				
22				
23				
24				
25				
26				
27				