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Attorneys for Defendants
Baltimore Orioles Limited Partnership and
Baltimore Orioles, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SERGIO MIRANDA, et al.,

Plaintiffs,

v.

OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
doing business as MAJOR LEAGUE
BASEBALL, et al.,

Defendants.

Case No. 3:14-cv-05349-HSG
**STIPULATION AND [PROPOSED]
ORDER FOR CHANGING TIME**

Judge: Hon. Haywood S. Gilliam, Jr.

Date Filed: December 5, 2014

Trial Date: None set

¹ With the exception of Baltimore Orioles Limited Partnership and Baltimore Orioles, Inc., Keker & Van Nest is counsel to all Defendants in this matter.

1 Pursuant to Local Civil Rules 6-1 and 6-2, the parties through undersigned counsel hereby
2 stipulate and respectfully request that the Court extend the deadline for Plaintiffs' Opposition to
3 Defendants' Motion to Dismiss. The parties declare in support of this request:

4 WHEREAS, pursuant to a Stipulation Changing Time, filed on March 4, 2015, the parties
5 stipulated to moving a scheduled case management conference from March 10, 2015 to March 17,
6 2015, due to a scheduling conflict for Plaintiffs' counsel;

7 WHEREAS, pursuant to the Stipulation and Order re Briefing Schedule and Page Limits,
8 issued on March 10, 2015, Plaintiffs' opposition to Defendants' motion to dismiss is due on June 25,
9 2015, and the Defendants' reply to the Plaintiffs' opposition is due on July 16, 2015;

10 WHEREAS, Plaintiffs request a five-day extension of time for filing the opposition to the
11 motion to dismiss, due to a scheduling conflict for Plaintiffs' counsel;

12 WHEREAS, Defendants do not oppose the request;

13 WHEREAS, Plaintiffs agree to extend the deadline of Defendants' reply to Plaintiffs'
14 opposition by five days;

15 THEREFORE, pursuant to Local Rule 6-2, the parties through their respective attorneys
16 stipulate as follows:

- 17 1. Plaintiffs shall file their Opposition to the Motion to Dismiss on June 30, 2015;
- 18 2. Defendants shall file their Reply to the Opposition on July 21, 2015.

19 **IT IS SO STIPULATED AND AGREED**

20
21 Dated: June 24, 2015

KEKER & VAN NEST LLP

22
23 By: /s/ R. Adam Lauridsen

JOHN W. KEKER
R. ADAM LAURIDSEN
THOMAS E. GORMAN
DAVID J. ROSEN

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26 Attorneys for Defendants

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RIFKIN, WEINER, LIVINGSTON,
LEVITAN AND SILVER, LLC

By: /s/ M. Celeste Bruce
ALAN MARK RIFKIN (*pro hac vice*)
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Attorneys for Defendants Baltimore Orioles
Limited Partnership and Baltimore Orioles,
Inc.

Dated: June 24, 2015

By: LAW OFFICES OF SAMUEL
KORNHAUSER

/s/ Samuel Kornhauser
SAMUEL KORNHAUSER

Attorneys for Plaintiffs

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CERTIFICATION OF CONCURRENCE FROM OTHER PARTIES

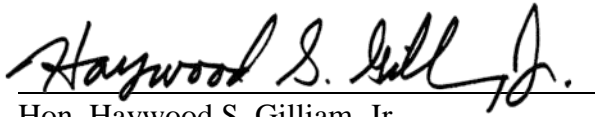
I, David J. Rosen, am the ECF user whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER FOR CHANGING TIME. In compliance with N.D. Cal. Civ. L.R. 5-1(i)(3), I hereby attest that each of the signatories has concurred in the filing of this document and has authorized the use of his or her electronic signature.

/s/ David J. Rosen
DAVID J. ROSEN

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IT IS SO ORDERED.

Dated: June 25, 2015


Hon. Haywood S. Gilliam, Jr.
Judge of the Northern District of California