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5 Attorneys for Defendants, ELECTRONIC
 6 DOCUMENT PROCESSING, INC. and
 JAY KATOFISKY

7
 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION
 10

11 HEATHER BARTELL,)
 12)
 13 Plaintiff,)
 14 vs.)
 15 ELECTRONIC DOCUMENT)
 PROCESSING, INC., A California)
 16 Corporation; JAY KATOFISKY,)
 individually and in his official capacity;)
 17 and DOES 1 through 10, inclusive)
 18 Defendants.)
 19 _____)

CASE NO: CV14-05501-EFL
STIPULATION TO EXTEND TIME
TO RESPOND TO COMPLAINT AND
TO CONTINUE FRCP 26(F) AND
ADR DEADLINES AND CASE
MANAGEMENT CONFERENCE;
[PROPOSED] ORDER THEREON
AS MODIFIED

[L.R. 6-2]

Current response date: March 3, 2015
 New response date: April 9, 2015

20 TO THE PARTIES HEREIN AND TO THE HONORABLE COURT:

21 WHEREAS, Plaintiff agrees to give Defendants Electronic Document Processing, Inc.
 22 and Jay Katofsky extended time to respond to the First Amended Complaint filed on February
 23 24, 2015 pursuant to Local Rules of Court 6-2 requiring an extension of deadlines fixed by the
 24 Court.

25 NOW, THEREFORE, IT IS HEREBY STIPULATED among the parties hereto, by and
 26 through their attorneys of record, James A. Michel, Esq. for the Plaintiff, and Steven S. Nimoy,
 27 Esq., for Defendants Electronic Document Processing, Inc. and Jay Katofsky, to the following:
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STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT AND TO CONTINUE FRCP
26(F) AND ADR DEADLINES AND CASE MANAGEMENT CONFERENCE; [PROPOSED]
ORDER THEREON

1 1. Based upon the filing of the First Amended Complaint, Defendants' response thereto
2 is currently due on March 10, 2015.

3 2. The parties wish to initiate informal settlement discussions. The parties believe that
4 a thirty (30) day extension of time to respond to the complaint through April 9, 2015 will
5 facilitate settlement discussions and increase the possibility that this case may be resolved
6 quickly.

7 3. The parties believe that an extension of the F.R.C.P. 26(f) and ADR deadlines, and
8 a continuance of the Initial Case Management Conference currently scheduled for March 17,
9 2015, would similarly facilitate resolution;

10 4. No previous agreements to extend time have been made;

11 5. The requested time modification would require that the Court continue the deadlines
12 and dates as listed in the Order Setting Initial Case Management Conference and ADR
13 Deadlines accordingly;

14 6. Pursuant to the foregoing, the parties request that the Court extend Defendants' time
15 to file the response to the initial complaint to April 3, 2015 and that the Court cancel the Order
16 Setting Initial Case Management Conference and ADR Deadlines and issue a new Order.

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18 IT IS SO STIPULATED.

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20 DATED: February 25, 2015

SOLTMAN, LEVITT, FLAHERTY & WATTLES
LLP

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23 By: /s/ Steven S. Nimoy
24 STEVEN S. NIMOY, ESQ.
25 Attorneys for Defendants,
26 ELECTRONIC DOCUMENT PROCESSING,
27 INC. and JAY KATOFISKY
28

1 DATED: February 25, 2015

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3 By: /s/ James A. Michel
4 JAMES A. MICHEL, ESQ.
5 Attorney for Plaintiff,
6 HEATHER BARTELL

7 PURSUANT TO STIPULATION, IT IS SO ORDERED:

8 Defendant Electronic Document Processing, Inc. and Jay Katofsky's time to respond to
9 the complaint is extended to April 9, 2015. The Case Management Conference is continued
10 to April 28, 2015 at 3:00 p.m. A case management statement must be filed no later than April
11 21, 2015.

12 DATED: February 26, 2015

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14 Honorable Elizabeth D. Laporte
15 United States Magistrate Judge
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