

1 Craig M. Stainbrook, Calif. State Bar #160876
 2 E-mail: craig@stainbrookllp.com
 STAINBROOK & STAINBROOK, LLP
 3 412 Aviation Boulevard, Suite H
 4 Santa Rosa, California 95403
 5 707.578.9333 phone
 6 707.578.3133 fax

7 Attorneys for Defendants,
 8 Sonoma County Go Local Cooperative,
 Incorporated and Sustaining Technologies, LLC

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA

13 Kelley Rajala,

14 Plaintiff,

16 vs.

17 Sonoma County Go Local Cooperative,
 18 Incorporated, Et Al.,

19 Defendants

20
 21 Sonoma County Go Local Cooperative,
 22 Incorporated and Sustaining Technologies,
 23 LLC,

24 Counterclaimants,

25 vs.

26 Rajala, Kelley, an individual, and
 27 Local Works, Flexible Purpose Corporation,
 A California Corporation,

28 Counterclaim Defendants.

Case No.: 15-CV-00442-JST

**JOINT STIPULATION TO
 EXTEND DEADLINE TO FILE
 DISPOSITIVE MOTIONS
 [PROPOSED] ORDER**

Honorable Jon S. Tigar

1 Defendants/Counterclaimants, Sonoma County Go Local Cooperative,
2 Incorporated and Sustaining Technologies, LLC, and Plaintiffs/Counterclaim
3 Defendants, Kelley Rajala and Local Works, Flexible Purpose Corporation, by and
4 through their respective counsel, jointly request that the Court grant a three-week
5 extension of time by which the parties must file dispositive motions. Should the
6 Court grant this request, the deadline to file dispositive motions would be moved
7 from its current date of June 10, 2016, to July 1, 2016. The grounds for this request
8 are as follows:

9
10 1. Pursuant to Court order, the parties engaged in an early neutral
11 evaluation on April 29, 2016, before evaluator Daralyn Durie of Durie Tangri
12 Lemley Roberts & Kent, in San Francisco.

13 2. The ENE process led to an agreement to settle the dispute, and a term
14 sheet was executed by both parties setting out the material terms of the agreement.

15 3. The Term Sheet recites that the agreement will be memorialized in a
16 final settlement agreement, and that any disputes regarding the finalization of the
17 agreement will be submitted to Daralyn Durie for resolution via binding
18 arbitration.

19 4. Since the date of the ENE, the parties, through counsel, have engaged
20 (and continue to engage) in a good faith effort to conclude a final settlement
21 agreement. However, there remain a few provisions over which the parties have
22 yet to agree.

23 5. Should the parties be unable to finalize the settlement agreement
24 before June 10, 2016, the parties will cooperate in scheduling a binding arbitration
25 with Ms. Durie at a time convenient for all parties and counsel.

26 6. Accordingly, for the reasons set forth above, the parties agree that in
27 the interests of fairness, in the interests of resolving the matter without further need
28 of court or neutral evaluator intervention, to preserve the parties' respective rights

1 to file dispositive motions should the need continue to exist, the parties respectfully
2 request that the Court grant a three-week extension of time to file dispositive
3 motions in this case.

4 7. No other dates in the current schedule under the Amended Scheduling
5 Order [Dkt 54], including dates for filing pre-trial briefs and motions, or trial, need
6 be disturbed.

7 Respectfully Submitted,

8
9 Dated: May 27, 2016

STAINBROOK & STAINBROOK, LLP

10 By: /s/ Craig M. Stainbrook

11
12 Craig M. Stainbrook
craig@stainbrookllp.com

13 Attorneys for Defendants/Counterclaimants
14 Sonoma County Go Local Cooperative,
15 Incorporated and Sustaining Technologies,
16 LLC

17
18 Dated: May 27, 2016

ONE LLP

19
20 By: /s/ Joanna Ardalan

21
22 Joanna Ardalan
jardalan@onellp.com

23 Attorneys for Plaintiff/Counterdefendants
24 Kelley Rajala and Local Works, Flexible
25 Purpose Corporation
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1
2 **ORDER**

3 PURSUANT TO STIPULATION, AND GOOD CAUSE HAVING BEEN
4 SHOWN, IT IS ORDERED that the deadline for filing dispositive motions is
5 extended to July 1, 2016.
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9 Dated: June 7, 2016

