WHEREAS the Further Case Management Conference in this matter is set for Nov 13, 2015; WHEREAS lead trial counsel for Defendant has an unavoidable family obli scheduled for November 13, 2015; and E & Stipulation and [Proposed] Order to Continue Further Case No. 3:15-cv-01051-			
 1301 Marina Village Parkway, Suite 310 Alameda, California 94501 Fax: (510) 337-2810 Fax: (510) 337-2811 Attorneys for Defendant CNH INDUSTRIAL AMERICA LLC UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA CARLOS BATRES, Plaintiff, Plaintiff, V. CNH AMERICA LLC; and Does 1 to 20, inclusive, Defendants. TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR NORTHERN DISTRICT OF CALIFORNIA, AND TO ALL PARTIES AND T COUNSEL OF RECORD HEREIN: Plaintiff Carlos Batres ("Plaintiff"), and Defendant CNH Industrial America, ("Defendant"), by and through their respective counsel of record, hereby stipulate as follow WHEREAS the Further Case Management Conference in this matter is set for Nov 13, 2015; WHEREAS lead trial counsel for Defendant has an unavoidable family obli scheduled for November 13, 2015; and 		Joan Pugh Newman (State Bar No. 148562)	
Telephone: (510) 337-2810 Fax: (510) 337-2811 Attorneys for Defendant CNH INDUSTRIAL AMERICA LLC 0 11 12 13 14 15 16 17 18 19 10 11 12 13 14 15 16 17 18 19 110 111 12 13 14 15 16 17 18 10 11 12 13 14 15 16 17 18 10 11 12 13 14 15 16 17 18 10 11 12		1301 Marina Village Parkway, Suite 310	
5 Attorneys for Defendant CNH INDUSTRIAL AMERICA LLC 6 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 CARLOS BATRES, 11 CARLOS BATRES, 12 Plaintiff, 13 V. 14 CNH AMERICA LLC; and Does 1 to 20, inclusive, 16 Defendants. 17 TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR 18 TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR 19 NORTHERN DISTRICT OF CALIFORNIA, AND TO ALL PARTIES AND TO 10 COUNSEL OF RECORD HEREIN: 21 Plaintiff Carlos Batres ("Plaintiff"), and Defendant CNH Industrial America, ("Defendant"), by and through their respective counsel of record, hereby stipulate as follow 23 WHEREAS lead trial counsel for Defendant has an unavoidable family obli 24 Steduled for November 13, 2015; and		Telephone: (510) 337-2810	
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28 e & Stipulation and [Proposed] Order to Continue Further Case No. 3:15-cv-01051-	26	scheduled for November 13, 2015; and	
e & Stipulation and [Proposed] Order to Continue Further Case No. 3:15-cv-01051-	27		
e & Stipulation and [Proposed] Order to Continue Further Case No. 3:15-cv-01051-	28		
h, LLP Case Management Conference	e & 1, LLP		Case No. 3:15-cv-01051-MMC

1	WHEREAS the parties have conferred and arrived at a mutually agreeable date to
2	continue the scheduled Further Case Management Conference and have confirmed the
3	availability of that future date with the Court.
4	Based on the foregoing, the parties hereby stipulate to continue the Further Case
5	Management Conference in this action to November 20, 2015.
6	IT IS SO STIPULATED.
7	
8	Date: August 25, 2015LAW OFFICE OF KENNETH C. ABSALOM
9	By: /s/ Kenneth C. Absalom
10	KENNETH C. ABSALOM GEORGE R. NEMIROFF
11	Attorneys for Plaintiff CARLOS BATRES
12	
13	Date: August 25, 2015 WILEY PRICE & RADULOVICH, LLP
14	By: <u>/s/ Joseph E. Wiley</u>
15	JOSEPH E. WILEY JOAN PUGH NEWMAN
16	Attorneys for Defendant CNH INDUSTRIAL AMERICA LLC
17	CINH INDUSTRIAL AMERICA LLC
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Wiley Price & Radulovich, LLP	Stipulation and [Proposed] Order to Continue Further Case No. 3:15-cv-01051-MMC Case Management Conference Case No. 3:15-cv-01051-MMC

1	<u>ORDER</u>
2	The parties having stipulated, and good cause appearing, the Further Case Management
3	Conference is to be continued to November 20, 2015, at 10:30 a.m. in Courtroom 7, 19th Floor.
4	Further Case Management Statements are due to be lodged, submitted, and served by no later
5	than November 13, 2015. No other Court-ordered dates in this matter are affected.
6	IT IS SO ORDERED.
7	Dated: August 31 , 2015
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9	UNITED STATES DISTRICT COURT JUDGE
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Wiley Price & Radulovich, LLP	Stipulation and [Proposed] Order to Continue Further Case No. 3:15-cv-01051-MMC Case Management Conference Case No. 3:15-cv-01051-MMC