1	Matthew G. Ball (SBN 208881)	
2	matthew.ball@klgates.com K&L GATES LLP	
3	Four Embarcadero Center, Suite 1200 San Francisco, CA 94111	
4	Telephone: (415) 882-8200 Facsimile: (415) 882-8220	
5	Attorneys for Plaintiff WORLD WRESTLIN ENTERTAINMENT, INC.	G
6	Robert F. Kane	
7	rkane1089@aol.com LAW OFFICES OF ROBERT F. KANE	
8	870 Market Street, Suite 1128 San Francisco, CA 94102	
9	Telephone: (415) 982-1510 Facsimile: (415) 982-5821	
10	Attorney for Defendants DOMINIC ANGEL RODRIGUEZ, VU TRUONG TRAN, and	
11	BENJAMIN ADHAM PECHETTI	
12	UNITED STATES DISTRICT COURT	
13	NORTHERN DISTRICT OF CALIFORNIA	
14		
15		
16	WORLD WRESTLING ENTERTAINMENT, INC.,	) Case Number: C 15-01263-VC
17	Plaintiff,	<ul><li>) STIPULATION TO CONTINUE INITIAL</li><li>) CASE MANAGEMENT CONFERENCE</li></ul>
18		) AND EXTEND RULE 26(f) DEADLINES;
19	vs.	) <del>[PROPOSED</del> ] ORDER AS MODIFIED )
20		)
21	DOMINIC ANGEL RODRIGUEZ, VU TRUONG TRAN, BENJAMIN ADHAM	)
22	PECHETTI, IBRAHAM NIMER SHIHEIBER, JOHN AND JANE DOES 1-	)
23	100, and XYZ CORPORATIONS 1-100,	)
24	Defendants.	)
25		)
26		
27		
28		
20	1	
	STIPULATION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE AND EXTEND RULE 26(f) DEADLINES and [PROPOSED] ORDER - Case Number: C 15-01263-VC	

The parties to the above-entitled action jointly submit this STIPULATION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE AND EXTEND RULE 26(f) DEADLINES and [PROPOSED] ORDER pursuant to Civil Local Rule 16-2.

WHEREAS, the Initial Case Management Conference is presently set for June 16, 2015, at 10:00 a.m., in Courtroom 4;

WHEREAS, counsel for Defendants filed an appearance in this court on June 1, 2015, and as such, the parties would like sufficient time to determine if they can resolve the matters between them at minimal cost, and minimal consumption of judicial resources;

WHEREAS, counsel hereby affirm that they have conferred and agree regarding the following request for relief; counsel have no objection to this continuance; and neither party is prejudiced by such continuance;

IT IS HEREBY REQUESTED, that the Initial Case Management Conference be continued by forty-five (45) days, and that all Rule 26(f) deadlines be similarly extended by forty-five (45) days, the date of the Conference to be July 31, 2015, or as hereafter determined by the Court.

Dated: June 5, 2015

/s/ Matthew G. Ball Matthew G. Ball Attorney for Plaintiff WORLD WRESTLING ENTERTAINMENT, INC.

Dated: June 5, 2015

/s/ Robert F. Kane Robert F. Kane

Attorney for Defendants DOMINIC ANGEL RODRIGUEZ, VU TRUONG TRAN, and BENJAMIN ADHAM PECHETTI

2

STIPULATION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE AND EXTEND RULE 26(f) DEADLINES and [PROPOSED] ORDER - Case Number: C 15-01263-VC

## **SIGNATURE ATTESTATION**

I hereby attest pursuant to Civil Local Rule 5.1 that concurrence in the electronic filing of this document has been obtained from the other signatory.

Dated: June 5, 2015

/s/ Matthew G. Ball Matthew G. Ball

IT IS SO ORDERED

AS MODIFIED

## CASE MANAGEMENT ORDER

The above STIPULATION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE AND EXTEND RULE 26(f) DEADLINES and [PROPOSED] ORDER is approved. The Initial Case Management Conference is hereby continued to July 31, 2015, at 10:00 a.m., in Courtroom 4, [or as follows: <u>August 4, 2015, at 10:00 a.m.</u>]. All Rule 26(f) deadlines are hereby extended by forty-five (45) days.

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: June 9, 2015

Judge Vince Chhabria DISTRI 3

UNI

STIPULATION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE AND EXTEND RULE 26(f) DEADLINES and [PROPOSED] ORDER - Case Number: C 15-01263-VC