1 2 3 4 5 6 7	Michael F. Ram, SBN #104805 Email: mram@rocklawcal.com Susan S. Brown, SBN #287986 Email: sbrown@rocklawcal.com RAM, OLSON, CEREGHINO & KOPCZYNSKI 555 Montgomery Street, Suite 820 San Francisco, California 94111 Telephone: (415) 433-4949 Facsimile: (415) 433-7311 [Additional Counsel Appear on Signature Page]		
8	Attorneys for Plaintiffs		
10	U.S. DISTRIC	T COURT	
11	NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION		
12	NATHAN BURGOON and CALEB LANDERS,		
13	on behalf of themselves and all others similarly situated,	NO. 3:15-cv-01381-EMC	
1415161718	Plaintiffs, vs. NARCONON OF NORTHERN CALIFORNIA d/b/a NARCONON REDWOOD CLIFFS, HALCYON HORIZONS, a California	STIPULATION AND [PROPOSED] ORDER ALTERING BRIEFING SCHEDULE FOR MOTIONS TO COMPEL ARBITRATION OR DISMISS COMPLAINT	
19	Corporation; NARCONON FRESH START d/b/a WARNER SPRINGS, a California	Hon. Edward M. Chen	
20	Corporation; ASSOCIATION FOR BETTER	JURY TRIAL DEMAND	
21	LIVING AND EDUCATION INTERNATIONAL, a California Corporation;	Complaint Filed: March 25, 2015	
22	NARCONON WESTERN UNITED STATES, a California Corporation; NARCONON	DATE: July 2, 2015 TIME: 1:30 p.m.	
23	INTERNATIONAL, a California Corporation; and DOES 1-100, ROE Corporations I – X,	LOCATION: Courtroom 5, 17th Floor	
24	inclusive,		
25	Defendants.		
26			
27	STIPULATION AND [PROPOSED] ORDER ALTERING BRIEFING SCHEDULE FOR MOTIONS TO COMPEL ARBITRATION OR DISMISS COMPLAINT - 1 CASE NO. 3:15-cv-01381-EMC		

1 I. RECITALS 2 Defendants Association for Better Living and Education International, Narconon 3 Western United States, Narconon International, and Narconon Fresh Start filed a motion to 4 compel arbitration or in the alternative to dismiss the complaint on May 22, 2015. Dkt. No. 27. 5 Defendant Halcyon Horizon, Inc. dba Narconon Northern California and dba Narconon 6 Redwood Cliffs (collectively "Defendants), also filed a similar motion on that same date. Dkt. 7 No. 25. 8 Plaintiffs requested, and Defendants agreed, to extend the briefing schedule for 9 Plaintiffs' opposition to these motions by one week – from June 5, 2015 to June 12, 2015. 10 Likewise, Defendants requested, and Plaintiffs agreed, to extend the briefing schedule for 11 Defendants' reply brief by an additional week – from June 12 to June 26, 2015. Under this 12 stipulation the hearing date would not change but would remain July 2, 2015 at 1:30 p.m. 13 II. STIPULATION 14 Therefore, the parties stipulate to the following briefing schedule for Defendants' 15 motions: 16 Plaintiffs' Oppositions Due: June 12, 2015 17 Defendants' Replies Due: June 26, 2015 18 Hearing Date: July 2, 2015, at 1:30 p.m. 19 July 23 20 21 22 23 24 25 26 27

STIPULATION AND [PROPOSED] ORDER ALTERING BRIEFING SCHEDULE FOR MOTIONS TO COMPEL ARBITRATION OR DISMISS COMPLAINT - 2 CASE No. 3:15-cv-01381-EMC

1	STIPULATED, DATED AND RESPEC	CTFULLY SUBMITTED this 4th day of June,
2	2015.	
3	TERRELL MARSHALL DAUDT	SCHEPER KIM & HARRIS LLP
4	& WILLIE PLLC	
5	By: /s/ Mary B. Reiten, SBN #203142 Beth E. Terrell, SBN #178181 Email: bterrell@tmdwlaw.com Mary B. Reiten, SBN #203142 Email: mreiten@tmdwlaw.com 936 North 34th Street, Suite 300 Seattle, Washington 98103-8869 Telephone: (206) 816-6603 Facsimile: (206) 350-3528 Michael F. Ram, SBN #104805 Email: mram@rocklawcal.co Susan S. Brown, SBN #287986 Email: sbrown@rocklawcal.com RAM, OLSON, CEREGHINO & KOPCZYNSKI 555 Montgomery Street, Suite 820 San Francisco, California 94111 Telephone: (415) 433-4949 Facsimile: (415) 433-7311	By: /s/ William H. Forman, SBN #150477 William H. Forman, SBN #150477 Email: wforman@scheperkim.com 601 West 5th Street, 12th Floor Los Angeles, California 90071 Telephone: (213) 613-4682 Facsimile: (213) 613-4656 Attorneys for Defendants Narconon Int'l, Narconon Fresh Start d/b/a WarnerSprings and Association for Better Living and Education
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23	Attorneys for Plaintiffs	
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STIPULATION AND [PROPOSED] ORDER ALTERING BRIEFING SCHEDULE FOR MOTIONS TO COMPEL ARBITRATION OR DISMISS COMPLAINT - 3 CASE NO. 3:15-cv-01381-EMC

GRUNSKY, EBEY, FARRAR & HOWELL 1 2 By: /s/ Dennis P. Howell, SBN #78806 Dennis P. Howell, SBN #78806 3 Email: dphowell@grunskylaw.com 4 Rosemary Rovick Email: rrovick@grunskylaw.com 5 240 Westgate Drive Watsonville, California 95076 6 Telephone: (831) 722-2444 7 Facsimile: (831) 722-6153 8 Attorneys for Defendants Halcyon Horizons, Inc. dba Narconon of Northern California 9 and dba Narconon Redwood Cliffs 10 III. [PROPOSED] ORDER 11 (modified above) PURSUANT TO STIPULATION IT IS SO ORDERED. 12 Dated this _____ day of _______, 2015. 13 14 15 16 T JUDGE 17 IS SO ORDERED 18 19 Judge Edward M. Chen 20 21 22 23 24 25 26 27

STIPULATION AND [PROPOSED] ORDER ALTERING BRIEFING SCHEDULE FOR MOTIONS TO COMPEL ARBITRATION OR DISMISS COMPLAINT - 4 CASE No. 3:15-cv-01381-EMC

1	CERTIFICATE OF SERVICE		
2	I, Mary B. Reiten, hereby certify that on June 4, 2015, I electronically filed the		
3	foregoing with the Clerk of the Court using the CM/ECF system which will send notification of		
4	such filing to the following:		
5	William H. Forman, SBN #150477		
6	Email: wforman@scheperkim.com SCHEPER KIM & HARRIS LLP		
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8	Telephone: (213) 613-4682 Facsimile: (213) 613-4656		
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11	Dennis P. Howell, SBN #78806		
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17	Email: dphowell@grunskylaw.com		
18	Attorneys for Defendants Halcyon Horizons, Inc. dba Narconon of Northern		
19	California and dba Narconon Redwood Cliffs		
20	DATED this 4th day of June, 2015.		
21			
22			
23			
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27	STIPULATION AND [PROPOSED] ORDER ALTERING REJECTING SCHEDULE FOR MOTIONS TO COMPEL		

STIPULATION AND [PROPOSED] ORDER ALTERING BRIEFING SCHEDULE FOR MOTIONS TO COMPEL ARBITRATION OR DISMISS COMPLAINT - 5 CASE No. 3:15-cv-01381-EMC

1	TERRELL MARSHALL DAUDT & WILLIE PLLC
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	STIPULATION AND [PROPOSED] ORDER ALTERING BRIEFING SCHEDULE FOR MOTIONS TO COMPEL ARBITRATION OR DISMISS COMPLAINT - 6 CASE NO. 3:15-CV-01381-EMC