

1 Brian E. Hawes (SBN 104519)
 Email: brian@haweslawfirm.com
 2 Law Offices of Brian E. Hawes
 1900 S. Norfolk Street, Suite 350
 3 San Mateo, CA 94403
 Telephone: +1 650 320 1616
 4 Facsimile: +1 650 763 8745

5 *Attorneys for Plaintiff*
Benjamin McPherson

6 Tiffany Renee Thomas (SBN 239085)
 7 Email: tthomas@reedsmith.com
 Renee C. Feldman (SBN 253877)
 8 Email: rfeldman@reedsmith.com
 REED SMITH LLP
 9 101 Second Street, Suite 1800
 San Francisco, CA 94105-3659
 10 Telephone: +1 415 543 8700
 Facsimile: +1 415 391 8269

11 *Attorneys for Defendant*
 12 *United Airlines, Inc.*

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA

16 BENJAMIN MCPHERSON,
 17 Plaintiff,
 18 vs.
 19 UNITED AIRLINES, INC., and DOES 1 through
 20 100, inclusive,
 21 Defendants.

No.: 15-cv-01393-SI
**STIPULATION AND ~~PROPOSED~~
 ORDER TO CONTINUE CASE
 MANAGEMENT CONFERENCE**

Date: July 9, 2015
 Time: 2:30 p.m.
 Place: Courtroom 10, 19th Floor
Honorable Susan Illston

REED SMITH LLP
 A limited liability partnership formed in the State of Delaware

22
23
24
25
26
27
28

1 Plaintiff Benjamin McPherson (“Plaintiff”) and Defendant United Airlines, Inc.
2 (“Defendant,” and collectively with Plaintiff, the “Parties”) jointly submit this Stipulation and
3 [Proposed] Order to Continue the current July 9, 2015 Case Management Conference to July 17,
4 2015, or as soon thereafter as the matter may be heard. The parties make this request for the
5 following reasons:

6 1. The Court set a July 10, 2015 Case Management Conference in this matter on April
7 28, 2015. (Doc. 15).

8 2. On June 10, 2015, lead counsel for Defendant served a Second Amended Notice of
9 Deposition that noticed the deposition of the plaintiff in another matter for June 9, 2015 in
10 Sacramento, California based upon an agreement reached by the parties in that matter.

11 3. Lead counsel for Defendant is scheduled to take a break during the deposition to
12 attend a telephonic state court case management conference in another matter at 20:30 a.m. on June
13 9, 2015.

14 4. On June 6, 2015, the Court Clerk issued a Notice advising the parties that the Case
15 Management Conference in this matter will be advanced to June 9, 2015.

16 5. Lead counsel for Defendant confirmed the June 9, 2015 deposition with Plaintiff’s
17 counsel before her receipt of the June 6, 2015 Notice.

18 6. Lead counsel for Defendant has been unable to continue the conflicting case state
19 court management conference since its receipt of the June 6, 2015 Notice.

20 7. Co-counsel for Defendant will be in Fresno, California on June 9, 2015 preparing for
21 trial.

22 8. The parties’ requested relief does not require a change to any pending deadlines as
23 this Court has not yet issued a Case Management Order.

24 9. The instant request for a continuance constitutes the parties’ first such request in this
25 action.

26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: July 8, 2015

REED SMITH LLP

By: /s/ Tiffany Renee Thomas
Tiffany Renee Thomas
Renee C. Feldman
Attorneys for Defendant
United Airlines, Inc.

DATED: July 8, 2015

LAW OFFICES OF BRIAN E. HAWES

By: /s/ Brian Hawes
Brian E. Hawes
Attorneys for Plaintiff
Benjamin McPherson

Pursuant to Local Rule 5.1(i)(3) the undersigned attests that concurrence in the filing of the document has been obtained from each of the signatories.

DATED: July 8, 2015

REED SMITH LLP

By: /s/ Tiffany Renee Thomas
Tiffany Renee Thomas
Renee C. Feldman
Attorneys for Defendant
United Airlines, Inc.

ORDER

Based on the above stipulation, and for good cause shown, IT IS HEREBY ORDERED as follows:

The Case Management Conference, current set for July 9, 2015, shall be continued to July 17, 2015.

IT IS SO ORDERED.

Dated: 7/9/15



HONORABLE SUSAN ILLSTON
Senior District Judge

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28