

1 TATAR LAW FIRM, APC  
 Stephanie R. Tatar (CA Bar No. 237792)  
 2 *Stephanie@thetatarlawfirm.com*  
 3 3500 West Olive Avenue, Suite 300  
 Burbank, CA 91505  
 Telephone: (323) 744-1146 / Facsimile: (888) 778-5695

4 Attorney for Plaintiff Michael Hunter and the Proposed Classes  
 5 Additional attorneys on signature page

6  
 7  
 8 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

9	MICHAEL HUNTER, individually and on	)	Case No. 3:15-cv-2300 (CRB)
10	behalf of a class of similarly situated persons,	)	
11	Plaintiff,	)	<b>JOINT STIPULATION AND ORDER</b>
12	v.	)	<b>REGARDING BRIEFING ON</b>
13	URS CORPORATION,	)	<b>DEFENDANT’S MOTION TO</b>
14	Defendant.	)	<b>TRANSFER VENUE</b>
15		)	Judge: Hon. Charles R. Breyer

16 WHEREAS, during the Case Management Conference held by the Court on September 11,  
 17 2015, Defendant URS Corporation (“Defendant”) expressed its intent to file a Motion to Transfer  
 18 this litigation (the “Motion”);

19 WHEREAS, during the September 11, 2015 Case Management Conference, counsel for  
 20 Plaintiff Michael Hunter (“Plaintiff”) stated that Plaintiff will need certain discovery in order to  
 21 meaningfully respond to any motion to transfer; Complaint;

22 WHEREAS, the Court’s Order following the Case Management conference (Dkt. No. 42)  
 23 directed Defendant to file the Motion by September 25, 2015, and set a November 20, 2015 hearing  
 24 date, but did not set further discovery or briefing deadlines;

25 WHEREAS, on September 25, 2015, Defendant filed a Motion to Transfer Venue (Dkt. No.  
 26 43), including declarations by three witnesses;  
 27  
 28

1 WHEREAS, on September 29, 2015, Plaintiff served written discovery requests and  
2 deposition notices seeking information, documents, and testimony which he contends is necessary to  
3 properly respond to the Motion, including deposition of the declarants supporting the Motion;

4 WHEREAS, Defendant provided objections and responses to Plaintiff's discovery requests  
5 and deposition notices on October 5, 2015;

6 WHEREAS, and the Parties subsequently met and conferred regarding Defendant's  
7 responses on October 22, 2015, and Defendant provided supplemental information thereafter, up to  
8 and including October 30, 2015;

9 WHEREAS, the deadline for Plaintiff to oppose the Motion was set for October 9, 2015  
10 pursuant to L.R. 7-3(a);

11 WHEREAS, the parties stipulated that Plaintiff's Opposition to the Motion would be due  
12 October 30, 2015, with any Reply by Defendant due November 13, 2015;

13 WHEREAS, Plaintiff's Opposition to Defendant's Motion is currently due October 30, 2015;

14 WHEREAS, the Parties have met and conferred and jointly propose that Plaintiff's  
15 Opposition to the Motion be due November 6, 2015, with any Reply by Defendant due November  
16 20, 2015;

17 WHEREAS, the hearing on the Motion is currently set for November 20, 2015;

18 WHEREAS, the Parties propose that the hearing on the Motion be set for December 4, 2015;

19 IT IS HEREBY STIPULATED by and between the parties, through their respective counsel  
20 of record, that Plaintiff's deadline to file an Opposition to Defendant's Motion to Transfer Venue  
21 (Dkt. No. 43) is set for November 6, 2015, and Defendant's deadline to file a Reply is November 20,  
22 2015.

23 DATED: October 30, 2015

Respectfully submitted,

FRANCIS & MAILMAN, PC

By: /s/ James A. Francis

James A. Francis

John Soumilas

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

Stephanie Tatar  
Sarah R. Schalman-Bergen  
Shanon J. Carson

FRANCIS & MAILMAN, P.C.  
James A. Francis, (PA Bar No. 77474)\*  
*jfrancis@consumerlawfirm.com*  
John Soumilas (PA Bar No. 84527)\*

*jsoumilas@consumerlawfirm.com*  
100 S. Broad Street, 19th Floor  
Philadelphia, PA 19110  
Telephone: (215) 735-8600  
Facsimile: (215) 940-8000

BERGER & MONTAGUE, P.C.  
Sarah R. Schalman-Bergen (PA Bar No. 206211)\*  
*Sschalman-bergen@bm.net*  
Shanon J. Carson (PA Bar No. 85957)\*  
*scarson@bm.net*  
1622 Locust Street  
Philadelphia, PA 19103  
Telephone: (215) 875-3053  
Facsimile: (215) 875-4604  
\*admitted *pro hac vice*

*Attorneys for Plaintiff Michael Hunter and the Proposed Classes*

DATED: October 30, 2015

SEYFARTH SHAW LLP

By: /s/ Tamara Fisher  
Laura J. Maechtlen  
Pamela Q. Devata\*  
Tamara Fisher  
William David

SEYFARTH SHAW LLP  
Pamela Q. Devata (IL Bar No. 6275731)\*  
*pdevata@seyfarth.com*  
131 South Dearborn Street, Suite 2400  
Chicago, Illinois 60603  
Telephone: (312) 460-5882  
Facsimile: (312) 460-7882  
\*admitted *pro hac vice*

*Attorneys for Defendant*

1 **ORDER**

2 Upon consideration of the parties' stipulation, it is hereby ordered that Plaintiff's deadline to  
3 file an Opposition to the Motion to Transfer Venue is November 6, 2015, and Defendant's deadline  
4 to file a Reply is November 20, 2015.  
5

6  
7 **IT IS SO ORDERED.**

8  
9 Date: Nov. 3, 2015



10 District Judge Charles R. Breyer  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28