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8 Attorneys for Plaintiff  
UNITED ENERGY TRADING, LLC

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION

12 UNITED ENERGY TRADING, LLC, )

13 Plaintiff, )

14 vs. )

15 PACIFIC GAS AND ELECTRIC )  
16 COMPANY, a California corporation,; )  
ALBERT TORRES, an individual; BILL )  
17 CHEN, an individual; TANISHA ROBINSON, )  
an individual, )

18 Defendants. )

Case No.: 3:15-CV-2383  
**STIPULATED REQUEST FOR AN  
ENLARGEMENT OF TIME TO FILE  
OPPOSITION AND REPLY BRIEFS  
REGARDING DEFENDANTS' MOTION  
TO DISMISS, CONTINUANCE OF  
HEARING DATE, AND ~~PROPOSED~~  
ORDER [RULES 6-2 AND 7-7]**

Judge: Hon. Richard Seeborg

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23 )  
24 COMES NOW the Plaintiff, United Energy Trading, LLC, by and through its attorneys,  
25 Holland & Knight, LLP, and the Defendants, Pacific Gas and Electric Company, Albert Torres, Bill  
26 Chen and Tanisha Robinson, by and through their attorneys Paul Hastings, LLP, and hereby file  
27 their Stipulated Request for an Enlargement of Time to File Opposition and Reply Briefs Regarding

28 STIPULATED REQUEST FOR AN ENLARGEMENT  
OF TIME TO FILE OPPOSITION AND REPLY BRIEFS  
REGARDING DEFENDANTS' MOTION TO DISMISS  
AND TO CONTINUE HEARING DATE

1 Defendants' *Motion to Dismiss* and continue the related hearing date. In support of the same, the  
2 Parties state as follows:

3  
4 On February 4, 2016, Defendants filed a *Motion to Dismiss* in response to Plaintiff's  
5 underlying *Amended Complaint*. (Dkt. No. 79.)

6 Per Local Rule 7-3(a), Plaintiff's *Brief in Opposition* to this *Motion* is due by February 18,  
7 2016.

8 Per Local Rule 7-3(c), Defendants' *Reply Brief in Support* of their *Motion to Dismiss* is due  
9 seven days from the filing of Plaintiff's *Opposition*, and no later than February 25, 2016.

10 The hearing date for this *Motion to Dismiss* is currently set for March 10, 2016. (Dkt. No.  
11 79.)

12 Plaintiff and Defendants now file this stipulated request that the due dates for the *Opposition*  
13 and *Reply* briefs, and the hearing date, be enlarged as follows:

14 That Plaintiff's *Brief in Opposition* to Defendants' *Motion to Dismiss* now be due March 18,  
15 2016;

16 That Defendants' *Reply in Support* of their *Motion to Dismiss* be due fourteen (14) days  
17 from the date Plaintiff's *Opposition* is filed and no later than April 1, 2016;

18 That the hearing date be continued to April 21, 2016.

19 Both briefing enlargements are sought in advance of the expiration of either filing deadline,  
20 pursuant to Local Rule 6-6(a).

21 The hearing continuance is sought before Plaintiff's *Opposition* has been filed and before  
22 the date that *Opposition* is due, currently February 18, 2016. It is thus properly requested under  
23 Local Rule 7-7(a).

1 The Parties have previously submitted stipulated requests to extend the time for Defendants  
2 to respond to Plaintiff's *Complaint* by two weeks and to Plaintiff's *Amended Complaint* by one  
3 month.

4 The Parties have also previously jointly requested changes to the briefing schedule  
5 regarding Defendants' *Motion to Dismiss* all claims of Plaintiff's original *Complaint*.

6 No other enlargements have been sought by the parties, and all of their joint requests have  
7 been granted.

8 None of the sought enlargements will otherwise change the schedule of case.

9 Good cause exists for all enlargements sought herein because: (1) none prejudices any of the  
10 Parties or the Court, (2) both serve to maintain the thirty-five (35) day notice schedule contemplated  
11 by Local Rule 7-2(a), and (3) both grant the Court more than the minimum amount of time to  
12 review the briefing as contemplated by Rule 7-2.

13 THEREFORE, pursuant to Local Rules 6-2(a) and 7-7(a), the Parties respectfully file this  
14 stipulated request that Plaintiff's *Brief in Opposition* to Defendants' *Motion to Dismiss* now be due  
15 March 18, 2016; that Defendants' *Reply in Support* of their *Motion to Dismiss* be due fourteen (14)  
16 days from the date Plaintiff's *Opposition* is filed and no later than April 1, 2016; and that the  
17 hearing on this matter be continued to April 21, 2016. The declaration of Thomas D. Leland,  
18 required by Local Rule 6-2, is filed contemporaneously with this *Motion*.

19 Respectfully submitted,

20 Dated: February 11, 2016

21 By: /s/ Adam M. Reich

22 Adam M. Reich  
23 Counsel for Defendants

24 Dated: February 11, 2016

25 By: /s/ Thomas D. Leland

26 Thomas D. Leland  
27 Counsel for Plaintiff

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**ORDER**

Good cause appearing therefor, IT IS HEREBY ORDERED THAT the Case Schedule is modified as follows:

Plaintiff's *Brief in Opposition* to Defendants' *Motion to Dismiss* is now due March 18, 2016.

Defendants' *Reply in Support* of their *Motion to Dismiss* is due fourteen (14) days from the date Plaintiff's *Opposition* is filed and no later than April 1, 2016.

The date of the hearing on this *Motion to Dismiss* is now set for April 21, 2016.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: 2/11/16



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The Honorable Richard Seeborg

UNITED STATES DISTRICT JUDGE