

1 ROBERT C. HILLIARD (*Pro Hac Vice*)
 2 MARION REILLY (*Pro Hac Vice*)
 3 HILLIARD MUÑOZ GONZALES L.L.P.
 4 719 S Shoreline Blvd., Suite #500
 5 Corpus Christi, TX 78401
 6 Telephone: (361) 882-1612
 7 Facsimile: (361) 882-3015
 8 bobh@hmglawfirm.com
 9 marion@hmglawfirm.com

7 Steve W. Berman (*Pro Hac Vice*)
 8 Anthea Grivas (*Pro Hac Vice*)
 9 HAGENS BERMAN SOBOL SHAPIRO LLP
 10 1918 Eighth Avenue, Suite 3300
 11 Seattle, WA 98101
 12 Telephone: (206) 623-7292
 13 Facsimile: (206) 623-0594
 14 steve@hbsslaw.com
 15 antheag@hbsslaw.com

12 Attorneys for Plaintiff
 13 GAIL PAYNE

14 *[Additional Counsel on Signature Page]*

KEKER & VAN NEST LLP
 JOHN W. KEKER - #49092
 R. ADAM LAURIDSEN - #243780
 THOMAS E. GORMAN - #279409
 PHILIP J. TASSIN - #287787
 633 Battery Street
 San Francisco, CA 94111
 Telephone: (415) 391-5400
 Facsimile: (415) 397-7188
 jkeker@kvn.com
 alauridsen@kvn.com
 tgorman@kvn.com
 ptassin@kvn.com

Attorneys for Defendants
 OFFICE OF THE COMMISSIONER OF
 BASEBALL (d/b/a MAJOR LEAGUE
 BASEBALL); and ROBERT D. MANFRED,
 JR.

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA

18 GAIL PAYNE, individually and on behalf of all
 19 others similarly situated,

20 Plaintiff,

21 v.

22 OFFICE OF THE COMMISSIONER OF
 23 BASEBALL (d/b/a MAJOR LEAGUE
 24 BASEBALL); and ROBERT D. MANFRED,
 25 JR.,

26 Defendants.

No. 3:15-cv-03229-SC

JOINT STIPULATION AND
~~PROPOSED~~ ORDER REGARDING
 DEADLINE TO FILE RESPONSE IN
 OPPOSITION TO DEFENDANTS'
 MOTION TO DISMISS

Judge: Hon. Samuel Conti

Date Filed: October 15, 2015

1 Plaintiff Gail Payne and Defendants Office of the Commissioner of the Baseball (d/b/a
2 Major League Baseball) and Robert D. Manfred, Jr., by and through their undersigned counsel,
3 dispute and agree as follows:

4 WHEREAS, on July 13, 2015, Plaintiff filed her Original Complaint;

5 WHEREAS, on October 2, 2015, Defendants filed a Motion to Dismiss the Original
6 Complaint pursuant to Federal Rule of Civil Procedure 12(b);

7 WHEREAS, Plaintiff's deadline to file her Response in Opposition to Defendants' Motion
8 to Dismiss is currently October 16, 2015;

9 WHEREAS, Plaintiff's deadline to file an Amended Complaint as a matter of right is
10 October 23, 2015;

11 WHEREAS, Defendants have agreed to withdraw their Motion to Dismiss the Original
12 Complaint if Plaintiff files an Amended Complaint by October 23, 2015;

13 WHEREAS, the parties believe that it would be inefficient to require Plaintiff to file her
14 Response in Opposition before her deadline to file an Amended Complaint;

15 IT IS THEREFORE STIPULATED that:

- 16 1. Plaintiff's Response to Defendants' Motion to Dismiss shall be continued from October
17 16, 2015 to October 23, 2015.

18 SO STIPULATED AND AGREED:

1 DATED: October 15, 2015

HILLIARD MUÑOZ GONZALES L.L.P.

2
3 By /s/ Robert C. Hilliard
4 ROBERT C. HILLARD
5 MARION M. REILLY

6 Attorneys for Plaintiff
7 GAIL PAYNE

8 DATED: October 15, 2015

9 By /s/ Steve W. Berman
10 STEVE W. BERMAN
11 ANTHEA GRIVAS

12 Attorneys for Plaintiff
13 GAIL PAYNE

14 DATED: October 15, 2015

15 By /s/ John W. Keke
16 JOHN W. KEKER
17 R. ADAM LAURIDSEN
18 THOMAS E. GORMAN
19 PHILIP J. TASSIN

20 Attorneys for Defendants
21 OFFICE OF THE COMMISSIONER OF
22 BASEBALL (d/b/a MAJOR LEAGUE
23 BASEBALL); and ROBERT D.
24 MANFRED, JR.

25 **PURSUANT TO A STIPULATION BETWEEN THE PARTIES, IT IS SO ORDERED:**

26 Plaintiff's deadline to file her Response in Opposition to Defendants' Motion to Dismiss is
27 continued to October 23, 2015.

28 Dated: 10/16/2015


United States District Court Judge