1	Mary Josephine Shea (SBN 113222)		
2	SHEA LAW OFFICES 1814 Franklin Street, Suite 800		
3	Oakland, CA 94612		
4	Tel: 510-208-4422 Fax: 415-520-9407		
5	Email: mary@shealaw.com		
	Attorneys for Plaintiff, KRISTEN LAZZARA		
6	CHERYL D. ORR (SBN 143196)		
7	cheryl.orr@dbr.com RAMON A. MIYAR (SBN 284990)		
8	ramon.miyar@dbr.com Drinker Biddle & Reath LLP		
9	50 Fremont Street, 20th Floor San Francisco, CA 94105-2235		
10	Telephone: (415) 591-7500 Facsimile: (415) 591-7510		
11	, ,		
12	Attorneys for Defendants RANDA ACCESSORIES LEATHER GOODS,		
13	LLC; MARKET CONNECT GROUP, INC. <i>Additional counsel listed on following page.</i>		
14	,		
15	UNITED STATES DISTRICT COURT		
	NORTHERN DISTRICT OF CALIFORNIA		
16	SAN FRANCISCO DIVISION		
17			
18	KRISTEN LAZZARA,	Case No. 3:15-cv-03233-EMC	
19	Plaintiff,	JOINT STIPULATION TO CONTINUE	
20	v.	JANUARY 28, 2016 CASE MANAGEMENT CONFERENCE AND	
21		CONTERENCE MAD	
22	RANDA ACCESSORIES LEATHER GOODS, LLC, a Delaware Limited		
23	Liability Company; MARKET CONNECT GROUP, INC., a Delaware Corporation;		
24	and Does 1 through 20, inclusive,		
	Defendant.		
25			
26			
27			
28			
	JOINT STIP TO CONTINUE JANUARY 28, 2016 CMC; [PROPOSED] ORDER 84401829.1	CASE No. 3:15-cv-03233-EMC	

1	KATE S. GOLD (SBN 156117)
2	kate.gold@dbr.com PHILIPPE A. LEBEL (SBN 274032)
3	philippe.lebel@dbr.com DRINKER BIDDLE & REATH LLP
4	1800 Century Park East Suite 1500
	Los Angeles, CA 90067-1517
5	Telephone: (310) 203-4000 Facsimile: (310) 229-1285
6	Counsel for Defendants
7	RANDA ACCESSORIES LEATHER GOODS,
8	LLC; MARKET CONNECT GROUP, INC.
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
23 24	
25	
26	
27	
28	

JOINT STIP TO CONTINUE JANUARY 28, 2016 CMC; [PROPOSED] ORDER 84401829.1

1	Plaintiff Kristen Lazzara ("Plaintiff"), on the one hand, and Defendants Randa		
2	Accessories Leather Goods, LLC and Market Connect Group, Inc. (collectively, "Defendants"),		
3	on the other hand, hereby agree as follows:		
4	WHEREAS, the Court set a case management conference in the above-captioned matter		
5	for January 28, 2016 at 9:30 a.m. in Courtroom 5;		
6	WHEREAS, lead counsel for Defendants is unable to attend in person on January 28,		
7	2016; and		
8	WHEREAS, the clerk of the Court informed counsel for Defendants that the Court would		
9	be amenable to a continuance of the case management conference so that lead counsel for		
10	Defendants could appear in person.		
11	Accordingly, the Parties stipulate and agree as follows:		
12	1. The case management conference presently set for January 28, 2016 shall be		
13	continued to February 3, 2016 at 9:30 a.m. in Courtroom 5; and		
14	2. Lead counsel for each of the Parties shall appear in person at the February 3, 2016		
15	case management conference.		
16	IT IS SO STIPULATED.		
17	Dated: January 27, 2016 SHEA LAW OFFICES		
18	By: /s/ Mary Josephine Shea		
19	Mary Josephine Shea		
20	Attorneys for Plaintiff KRISTEN LAZZARA		
21			
22	Dated: January 27, 2016 DRINKER BIDDLE & REATH LLP		
23	By: /s/ Cheryl D. Orr		
24	Cheryl D. Orr		
25	Attorneys for Defendants RANDA ACCESSORIES LEATHER		
26	GOODS, LLC; MARKET CONNECT GROUP, INC.		
27			
28	Collectively, Plaintiff and Defendants are referred to herein as the "Parties."		

JOINT STIP TO CONTINUE JANUARY 28, 2016 CMC; [PROPOSED] ORDER 84401829.1

1	[PROPOSED] ORDER	
2	Upon consideration of Plaintiff Kristen Lazzara's and Defendants Randa Accessories	
3	Leather Goods, LLC and Market Connect Group, Inc. Joint Stipulation to Continue January 28,	
4	2016 Case Management Conference, and for good cause shown, the Court hereby ORDERS as	
5	follows:	
6	1. The case management conference presently set for January 28, 2016 shall be	
7	continued to February 3, 2016 at 9:30 a.m. in Courtroom 5; and	
8	2. Lead counsel for each of the Parties shall appear in person at the February 3, 2016	
9	case management conference.	
10	IT IS SO ORDERED.	
11		
12 DATED: January <u>27th</u> , 2016		
13	•	
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		

28

1 SIGNATURE CERTIFICATION 2 I am the ECF User whose identification and password are being used to file the foregoing 3 JOINT STIPULATION TO CONTINUE JANUARY 28, 2016 CASE MANAGEMENT 4 CONFERENCE AND [PROPOSED] ORDER. Pursuant to Civil Local Rule 5.1 of the Northern 5 District of California, I hereby attest that the content of this document is acceptable to Mary 6 Josephine Shea, counsel to Plaintiff, and that I have obtained Ms. Shea's permission to affix her 7 electronic signature to this document. 8 Dated: January 27, 2016 DRINKER BIDDLE & REATH LLP 9 10 By: /s/ Cheryl D. Orr 11 Cheryl D. Orr Kate S. Gold 12 Philippe A. Lebel Ramon A. Miyar 13 Attorneys for Defendants 14 RANDA ACCESSORIES LEATHER GOODS, LLC; MARKET CONNECT 15 GROUP, INC. 16 17 18 19 20 21 22 23 24 25 26 27

28