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9
 10 **UNITED STATES DISTRICT COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA**

12 ANED LOPEZ, on Behalf of Himself
 and Others Similarly Situated,

13 Plaintiff,

14 v.

15 P.W. STEPHENS
 16 ENVIRONMENTAL, INC. a Delaware
 Corporation, and DOES 1-10 inclusive

17 Defendants.

Case No. 3:15-cv-03579-MEJ

**JOINT STIPULATED REQUEST
 AND PROPOSED ORDER TO
 CHANGE TIME PURSUANT TO
 LOCAL RULE 6-2**

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 20 Pursuant to Defendant's request, the Parties have stipulated that the briefing
 21 deadlines on Plaintiff's Motion to Facilitate Collective Action Notice, D.I. No. 11
 22 (the "Motion") be extended by one additional week. Good cause exists for the
 23 following reasons:

24 Plaintiff filed her Complaint on August 4, 2015. Plaintiff served the
 25 Complaint on or about August 12, 2015. Defendant has not made an appearance
 26 in the case.

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 28 Case No.: 3:15-cv-03579-MEJ

**JOINT STIPULATED REQUEST AND PROPOSED ORDER TO CHANGE TIME
 PURSUANT TO LOCAL RULE 6-2**

1 Plaintiff filed the Motion on Friday, August 14, 2015. As Defendant had
2 not yet made an appearance in the case, Plaintiff served the Motion via Federal
3 Express and sent a courtesy copy via e-mail to Defendant's attorney, John Lattin.
4 According to the Court's docket entry for August 14, 2015, Defendant's deadline
5 to file an opposition brief is August 28, 2015.

6 John Lattin, who is a partner at Fisher & Phillips and lead counsel for
7 Defendant, has been out of the country on a family vacation since Friday, August
8 14, 2015. He is scheduled to return to the office on Wednesday, August 26,
9 2015. Aaron Olsen, who is of counsel for Fisher & Phillips will be assisting Mr.
10 Lattin in this case. However, Mr. Olsen is scheduled to be out of town from
11 Tuesday, August 25, 2015 through Friday, August 28, 2015 in order to take his
12 daughter to college.

13 Accordingly, Defendant respectfully requests that the deadline to respond to
14 Plaintiff's Motion and the corresponding deadline to file a reply brief be extended
15 by one additional week.

16 Furthermore, Defendant respectfully requests that, pursuant to the Court's
17 August 17, 2015 docket entry (D.I. No. 20), Defendant be permitted to file its
18 consent or declination to proceed before a Magistrate Judge by 8/28/2015.

19 There have been no other requests for time modifications in this case.

20 The parties are not aware of any effect that this change in schedule would
21 have in the case.
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Dated: August 21, 2015

Respectfully submitted,
FISHER & PHILLIPS LLP

By: /s/-AARON F. OLSEN
JOHN E. LATTIN IV
AARON F. OLSEN
Attorneys for Defendant(s)
P.W. STEPHENS
ENVIRONMENTAL, INC.

Dated: August 21, 2015

LEONARD CARDER LLP

By: /s/-AARON D. KAUFMANN
AARON D. KAUFMANN
Attorneys for Plaintiff and Proposed
Class

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED August 21, 2015

HONORABLE MARIA-ELENA JAMES