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8
 9 **UNITED STATES DISTRICT COURT**
 10 **NORTHERN DISTRICT OF CALIFORNIA**
 11 **SAN FRANCISCO DIVISION**

12 JOEL BRIGHTBILL and PATRICIA
 PAYEUR,

13 Plaintiffs,

14 vs.

15 GENERAL MOTORS, LLC, (A.K.A
 16 "NEW GM") AND DOES 1-100,

17 Defendants.

Case No. 3:15-cv-03789-MMC

[Assigned to Hon. Maxine M. Chesney]

JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO
CONTINUE CASE MANAGEMENT
CONFERENCE

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 19 IT IS HEREBY STIPULATED by and between Plaintiffs Joel Brightbill and
 20 Patricia Payeur and Defendant General Motors LLC (collectively referred to as “the
 21 Parties”), by and through their attorneys of record, as follows:

22 1. The Parties have exchanged Rule 26 initial disclosures and participated
 23 in a full day of mediation on March 28, 2016 in San Jose with mediator Charles
 24 Hawkins. Substantial progress was made at the mediation but a settlement was not
 25 reached. The Parties agreed at the conclusion of the mediation to continue settlement
 26 discussions for the next 30 days.

27 2. The parties believe there is a reasonable likelihood of resolving this case
 28 through continued settlement discussions. Good cause therefore exists to continue

1 the Case Management Conference (CMC), currently set for April 15, 2016 at 10:30
2 a.m. to avoid the time and expense associated with preparing the CMC report and
3 appearing at the conference.

4 3. Accordingly, the parties stipulate and request that the court continue the
5 CMC to May 13, 2016 at 10:30 a.m. If the case has not settled, the Parties will file a
6 CMC Statement at least one week prior to the continued CMC date. If the case
7 settles between now and then, the parties will notify the Court that the CMC can be
8 taken off calendar.

9 4. The Parties also agree that, should any of the above-referenced proposed
10 dates be inconvenient or unacceptable for any reason, the Court has the discretion to
11 set other dates which are more convenient or acceptable. However, counsel request
12 that, in any event, the current proposed dates in this matter be continued to a time that
13 is at least after May 13, 2016.

14
15 Dated: March 30, 2016

DYKEMA GOSSETT LLP

17 By: /s/ Derek S. Whitefield
18 Derek S. Whitefield
19 Attorneys for Defendant,
GENERAL MOTORS, LLC

20 Dated: March 30, 2016

LAW OFFICES OF BONNER & BONNER

22 By: /s/ Charles A. Bonner
23 Charles A. Bonner
24 Attorneys for Plaintiffs,
25 JOEL BRIGHTBILL AND
PATRICIA PAYEUR

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1 I hereby attest that I have on file all holographic signatures corresponding to any
2 signatures indicated by a conformed signature (/S/) within this e-filed document.

3
4 Dated: March 30, 2016

DYKEMA GOSSETT LLP

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By: /s/ Derek S. Whitefield
Derek S. Whitefield
Attorneys for Defendant,
GENERAL MOTORS, LLC

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

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12 Dated: Mar. 30, 2016


United States District Judge

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