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 5
 Attorneys for Plaintiff
 6 WILLIAMS-SONOMA, INC.

7
 8 UNITED STATES DISTRICT COURT
 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 WILLIAMS-SONOMA, INC.,
 12 Plaintiff,
 13 v.
 14 ARGENTO SC BY SICURA INC.,
 15 Defendant.

Case No. 3:15-cv-4751

**JOINT REQUEST TO CONTINUE
 INITIAL CASE MANAGEMENT
 CONFERENCE; [~~PROPOSED~~]
 ORDER**

CMC Date: January 15, 2016
 CMC Time: 2:00 p.m.

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 19 Plaintiff Williams-Sonoma, Inc. (“WSI”) requests that the Initial Case Management
 20 Conference in this matter currently scheduled for January 15, 2016, be continued for six weeks to
 21 February 26, 2016, at 2:00 p.m., and that the corresponding Fed. R. Civ. P. 26 deadlines also be
 22 continued for six weeks. WSI also requests that Argento’s deadline for a responsive pleading be
 23 moved to January 27, 2016. As indicated below, Defendant has agreed to these requests through its
 24 non-California outside counsel.

25 Defendant Argento SC by Sicura Inc. (“Argento”) was served on December 8, 2015. WSI is
 26 informed that Argento has not yet retained California counsel and, in order to accomplish this and to
 27 conclude settlement discussions the parties are having, the parties jointly should seek the requested
 28 extensions. The requested adjustments to the schedule would afford Argento time to retain counsel

1 and for the parties to meet and confer in accordance with federal and local rules in advance of the
2 Initial Case Management Conference.

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4 Date: December 23, 2015

Respectfully submitted,

5 KILPATRICK TOWNSEND AND STOCKTON LLP

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7 By: /s/ Gregory S. Gilchrist
GREGORY S. GILCHRIST

8 Attorneys for Plaintiff
9 WILLIAMS-SONOMA, INC.

10 Approved:

11 Oved & Oved, LLP

12
13 By: /s/ Aaron J. Solomon

14 Attorneys for Defendant
15 ARGENTO SC BY SICURA INC.
(Not Admitted In California)

16
17
18 **[PROPOSED] ORDER**

19 GOOD CAUSE APPEARING THEREFOR, it is hereby ordered that plaintiff Williams-
20 Sonoma, Inc.'s request to continue the Initial Case Management Conference is granted. The Initial
21 Case Management Conference is hereby scheduled for February 26, 2016, at 2:00 p.m. and other Rule
22 26 deadlines are correspondingly continued for six weeks. Defendant's deadline for responding to the
23 complaint is extended until January 27, 2016. Williams-Sonoma, Inc. shall serve this order on
24 Defendant.

25
26 DATED: 12/29/15

/s/ Joseph C. Spero
27 Hon. Joseph C. Spero
28 United States Magistrate Judge

PROOF OF SERVICE

I, Shelley Lott, declare:

I am employed in the City and County of San Francisco, California; I am over the age of 18 years and not a party to the within action; my business address is Two Embarcadero Center, Eighth Floor, San Francisco, California 94111. On the date set forth below, I served a true and accurate copy of the document(s) entitled **JOINT REQUEST TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE; [PROPOSED] ORDER** on the party(ies) in this action by placing said copy(ies) in a sealed envelope each addressed as follows:

By Agreement

Aaron J. Solomon
Darren Oved
Oved & Oved, LLP
401 Greenwich Street
New York, New York 10013
Email: aaron@ovedlaw.com; darren@ovedlaw.com
Telephone: 212.226.2376
Facsimile: 212.226.7555

[By Electronic Transmission] I caused said document to be sent by electronic transmission via LexisNexis File & ServeXpress.

[By E-Mail] I caused said document to be sent by electronic transmission to the e-mail address(es) indicated for the party(ies) listed above.

[By First Class Mail] I am readily familiar with my employer's practice for collecting and processing documents for mailing with the United States Postal Service. On the date listed herein, following ordinary business practice, I served the within document(s) at my place of business, by placing a true copy thereof, enclosed in a sealed envelope, with postage thereon fully prepaid, for collection and mailing with the United States Postal Service where it would be deposited with the United States Postal Service that same day in the ordinary course of business.

[By Overnight Courier] I caused each envelope to be delivered by a commercial carrier service for overnight delivery to the offices of the addressee(s).

[By Hand] I directed each envelope to the party(ies) so designated on the service list to be delivered by courier this date.

[By Facsimile Transmission] I caused said document to be sent by facsimile transmission to the fax number indicated for the party(ies) listed above.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this date at San Francisco, California.

Dated: December 23, 2015


Shelley Lott