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VENABLE LLP
Ari N. Rothman (SBN 296568)
anrothman@venable.com
Witt W. Chang (SBN 281721)
wchang@venable.com
Sean P. Hanle (SBN 298928)
sphanle@venable.com
2049 Century Park East, Suite 2300
Los Angeles, CA 90067
Telephone: (310) 229-9900
Facsimile: (310) 229-9901

Attorneys for defendants
SBE ENTERTAINMENT GROUP, LLC,
6021 HOLLYWOOD INVESTORS, LLC,
AND 6021 HOLLYWOOD OPERATING
COMPANY, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

DERIC WALINTUKAN,

Plaintiff,

v.

SBE ENTERTAINMENT GROUP, LLC; 6021
HOLLYWOOD INVESTOR, LLC; 6021
HOLLYWOOD OPERATING COMPANY,
LLC,

Defendants.

CASE NO. 3:16-cv-01311-JST

Hon. Jon S. Tigar

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO EXTEND
TIME TO HOLD ADR SESSION**

VENABLE LLP
2049 CENTURY PARK EAST, SUITE 2300
LOS ANGELES, CA 90067
310-229-9900

1 Plaintiff Deric Walintukan and Defendants SBE Entertainment Group, LLC; 6021
2 Hollywood Investor, LLC; and 6021 Hollywood Operating Company, LLC submit this
3 Stipulation to extend the time to hold a Private ADR Session from January 13, 2017 to July 14,
4 2017. **Good cause** exists to grant this Stipulation for the following reasons:

5 1. On February 16, 2016, Plaintiff filed his initial complaint in the Superior Court of
6 California for the County of San Mateo (Case No. CIV537398);

7 2. On March 16, 2016, Defendants removed the action to the United States District
8 Court for the Northern District of California (ECF No. 1);

9 3. On June 13, 2016, pursuant to Civil L.R. 16-8 and ADR L.R. 3-5, the parties
10 entered into a stipulation to hold a private mediation before JAMS by January 13, 2017 (ECF
11 No. 35);

12 4. On November 9, 2016, plaintiff filed a motion for leave to file an amended
13 complaint (ECF No. 43) with a hearing date currently set for February 9, 2017;

14 5. The parties require additional time to hold a Private ADR session due to the
15 forthcoming hearing on Plaintiff's motion to file an amended complaint, the outcome of which
16 may significantly alter preparations for and negotiations during a private mediation session;

17 6. Trial has not been set; and

18 7. No party will suffer any prejudice if the Court grants the requested relief, and
19 granting the requested relief will not unduly delay this litigation.

20 Based on the foregoing, IT IS HEREBY STIPULATED AND AGREED, subject to
21 Court approval, that:

22 1. The deadline for the parties to hold a Private ADR session is set for July 14, 2017.
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DATED: January 10, 2017

VENABLE LLP

By: /s/ Ari N. Rothman

Ari N. Rothman
Witt W. Chang
Sean P. Hanle

Attorneys for defendants
SBE ENTERTAINMENT GROUP, LLC;
6021 HOLLYWOOD INVESTORS, LLC;
AND 6021 HOLLYWOOD OPERATING
COMPANY, LLC

DATED: January 10, 2017

JAURIGUE LAW GROUP

By: /s/ Abigail A. Zelenski

Michael J. Jaurigue
Abigail A. Zelenski
David Zelenski

GLANCY PRONGAY & MURRAY LLP

Lionel Z. Glancy
Marc L. Godino
Mark S. Greenstone

Attorneys for plaintiff
DERIC WALINTUKAN

ATTESTATION REGARDING SIGNATURES

I, Ari N. Rothman, attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing’s content and have authorized the filing.

DATED: January 10, 2017

VENABLE LLP

/s/ Ari N. Rothman

* * *

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

DATED



VENABLE LLP
2049 CENTURY PARK EAST, SUITE 2300
LOS ANGELES, CA 90067
310-229-9900

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