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10 Attorneys for Defendant  
 SEAGATE TECHNOLOGY LLC

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12 UNITED STATES DISTRICT COURT  
 13 NORTHERN DISTRICT OF CALIFORNIA  
 14 SAN FRANCISCO DIVISION

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16 EVERETT CASTILLO, LINDA CASTILLO,  
 17 NICHOLAS DATTOMA, FRED A LANG,  
 WENDY TRAN, and STEVEN WILK,  
 18 individually and on behalf of all others similarly  
 situated,

19 Plaintiffs,

20 v.

21 SEAGATE TECHNOLOGY LLC,

22 Defendant.

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Case No. 3:16-cv-01958-RS

**STIPULATION AND ~~PROPOSED~~  
 ORDER CONTINUING JULY 21,  
 2016 CASE MANAGEMENT  
 CONFERENCE**

Judge: Hon. Richard Seeborg  
 Action Filed: April 14, 2016

1 Pursuant to Local Rules 6-2 and 7-12, Plaintiffs EVERETT CASTILLO, LINDA  
2 CASTILLO, NICHOLAS DATTOMA, FRED A LANG, WENDY TRAN, and, STEVEN  
3 WILK (“Plaintiffs”), on behalf of themselves and all others similarly situated, and Defendant  
4 Seagate Technology LLC (“Seagate”), through their undersigned counsel, hereby stipulate as  
5 follows:

6 WHEREAS, on June 15, 2016, the Court granted the parties’ stipulation to consolidate  
7 two actions related to Seagate’s security practices: *Castillo et al. v. Seagate Technology LLC*,  
8 No. 3:16-cv-01958-RS (filed on April 14, 2016) and *Dattoma v. Seagate Technology LLC*, No.  
9 C5:16-cv-02136-RS (filed on April 21, 2016) (Dkt. No. 19);

10 WHEREAS, Plaintiffs filed their Amended Consolidated Complaint on June 28, 2016  
11 (Dkt. No. 22);

12 WHEREAS, pursuant to the parties’ stipulation and the Court’s Order, Seagate’s  
13 deadline to file its response is July 28, 2016 (*See* Dkt. No. 19 1:26-2:2);

14 WHEREAS, the Case Management Conference for this matter is currently scheduled for  
15 July 21, 2016, and the Joint Case Management Statement is due a week earlier, on July 14, 2016  
16 (*See Castillo* Dkt. No. 9; *Dattoma* Dkt. No. 12);

17 WHEREAS, the parties agree that judicial efficiency would best be served by continuing  
18 the Case Management Conference until after Seagate has had the opportunity to analyze the  
19 allegations in the Amended Consolidated Complaint and to allow the parties an opportunity to  
20 meaningfully confer about the claims and defenses at issue and to brief any pleading motion;

21 WHEREAS, the parties agree that the Case Management Conference should be  
22 rescheduled to September 8, 2016 or a date thereafter convenient for the Court;

23 WHEREAS, the parties agree that all dates based on the initial case management  
24 conference, including the parties’ deadline to meet and confer regarding initial disclosures, early  
25 settlement, the ADR process, and a discovery plan, as well as their deadline to file the Joint  
26 Case Management Conference Statement and Rule 26(f) report and complete initial disclosures,  
27 should be continued in accordance with the new case management conference date;

28 IT IS HEREBY STIPULATED AND AGREED by the parties, through their counsel,

1 subject to the approval of the Court, that the July 21, 2016 Case Management Conference is  
2 continued to **September 8, 2016 at 10:00 a.m.** The parties shall meet and confer regarding initial  
3 disclosures, early settlement, ADR process selection, and a discovery plan—as well as file their  
4 ADR Certification and a Stipulation to ADR Process or Notice of Need for ADR Phone  
5 Conference—21 days prior to that date, on **August 18, 2016.** The parties shall file their Rule  
6 26(f) Report, complete initial disclosures, and file a Case Management Statement 7 days prior to  
7 September 8, on **September 1, 2016.**

8 Dated: July 5, 2016

**MORRISON & FOERSTER LLP**

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11 By: /s/ Tiffany Cheung

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Tiffany Cheung

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17 Attorneys for Defendant

SEAGATE TECHNOLOGY LLC

1 Dated: July 5, 2016

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**ECF ATTESTATION**

I, Tiffany Cheung, am the ECF User whose ID and password are being used to file the following STIPULATION AND [PROPOSED] ORDER CONTINUING CASE MANAGEMENT CONFERENCE. In compliance with Local Rule 5-1(i)(3), I hereby attest that Mark S. Greenstone has concurred in this filing.

Dated: July 5, 2016

DAVID F. MCDOWELL  
TIFFANY CHEUNG  
ALEXANDRA E. LAKS  
MORRISON & FOERSTER LLP


By: /s/ Tiffany Cheung  
TIFFANY CHEUNG

Attorneys for Defendant  
SEAGATE TECHNOLOGY LLC

**~~PROPOSED~~ ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 7/5, 2016

  
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HON. RICHARD SEEBORG  
United States District Judge