

ABBEY, WEITZENBERG, WARREN & EMERY, P.C.
100 Stony Point Road, Suite 200, P.O. Box 1566, Santa Rosa, CA 95402-1566
Telephone: (707) 542-5050 Facsimile (707) 542-2589

1 LEWIS R. WARREN, ESQ. (SBN 115411)
lwarren@abbeylaw.com
2 MICHAEL R. WANSER, ESQ. (SBN 283822)
mwanser@abbeylaw.com
3 ABBEY, WEITZENBERG, WARREN & EMERY, P.C.
100 Stony Point Road, Suite 200
4 Santa Rosa, CA 95401
Telephone: (707) 542-5050
5 Facsimile: (707) 542-2589

6 Attorneys for JOE C. GREENBERG and
7 NICHOLAS CLAUSSEN

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

11 CROP PRODUCTION SERVICES, INC., a) Case No. 3:16-cv-04020 (WHA)
Delaware corporation,)
12))
Plaintiff,) **STIPULATED REQUEST FOR ORDER**
13) **CONTINUING THE INITIAL CASE**
v.) **MANAGEMENT CONFERENCE**
14))
JOEY C. GREENBERG, an individual; and) Action Filed: July 15, 2016
15 NICHOLAS CLAUSSEN,)
16 Defendants.)

17 **STIPULATION**

18 Pursuant to Civil Local Rule 6-2(a), Defendants Joey C. Greenberg and Nicholas Claussen
19 (collectively, the “Defendants”) on the one hand, and Plaintiff Crop Production Services, Inc.
20 (“Plaintiff”), on the other hand, by and through their respective counsel of record, hereby submit
21 this Stipulated Request for Order Continuing the Date of the Initial Case Management
22 Conference, currently set for October 13, 2016, to November 10, 2016, and state as follows:

- 23 WHEREAS, Plaintiff filed its initial Complaint in this matter on July 15, 2016;
- 24 WHEREAS, on July 19, 2016, prior to Defendants being served with the Complaint, the
25 Court issued an initial Case Management Scheduling Order setting the initial Case Management
26 Conference for October 13, 2016;
- 27 WHEREAS, Plaintiff filed its First Amended Complaint on August 1, 2016;
- 28 WHEREAS, Defendants were served with process in this matter on August 25, 2016;

1 WHEREAS, Lewis Warren and Michael Wanser of Abbey, Weitzenberg, Warren, &
2 Emery, P.C., were retained in this matter by Defendants on or about September 14, 2016;

3 WHEREAS, as more fully discussed in the accompanying Declaration of Lewis Warren,
4 Mr. Warren is lead trial counsel for the Defendants and will be out of the country on the date
5 presently set for the initial Case Management Conference due to a long-standing vacation, which
6 was scheduled long before the Defendants were served in this matter and long before Mr. Warren
7 was retained as their counsel;

8 WHEREAS, Mr. Warren has a substantive hearing in a matter in Sonoma County Superior
9 Court scheduled for the morning of November 3, 2016;

10 WHEREAS, on September 22, 2016, the parties met and conferred in accordance with
11 FRCP Rule 26(f), and, during that conference, Defendants requested and Plaintiff consented to a
12 continuance to November 10, 2016, for the initial Case Management Conference;

13 WHEREAS, the Parties have previously stipulated to a two-week extension of time for
14 Defendants to respond to the First Amended Complaint [ECF No. 28] and, except for the
15 foregoing, no other time modifications have been requested in this case; and

16 WHEREAS, the requested modification of the initial Case Management Conference date
17 will also extend the date by which the parties must file the Joint Case Management Statement in
18 accordance with FRCP Rule 26(f) and Northern District Local Rule 16-9 and, except for the
19 foregoing, the requested modification will not materially affect the schedule in the instant case.

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NOW THEREFORE, IT IS HEREBY STIPULATED by and between the parties, through their respective counsel, that the parties request the Court to enter an Order changing the date of the Initial Case Management Conference from October 13, 2016, to November 10, 2016.

Dated: September 29, 2016

ABBEY, WEITZENBERG, WARREN & EMERY

/s/ Lewis Warren
Lewis Warren
Michael R. Wanser
Attorneys for JOEY C. GREENBERG and NICHOLAS CLAUSSEN

BRYAN CAVE LLP

/s/ Thomas S. Lee
Robert A. Padway
Michael J. Hoffman
Thomas S. Lee
Attorney for Plaintiff CROP PRODUCTION SERVICES, INC.

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ORDER

Pursuant to stipulation, and for good cause shown, the initial Case Management Conference and all associated deadlines shall be continued to November 10, 2016 at 11:00 a.m. in Courtroom 8, 19th Floor, San Francisco, California.

IT IS SO ORDERED.

Dated: September 29, 2016.



HON. WILLIAM ALSUP
UNITED STATES DISTRICT JUDGE