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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

ICE CONSULTING, INC. *et al.*,  
  
                    Plaintiffs,  
  
                    v.  
  
GAVIN JENSEN,  
  
                    Defendant.

Case Number: 16-CV-04349-EMC

**STIPULATED REQUEST BY ALL  
PARTIES FOR AN EARLY REFERRAL  
TO A JUDICIAL SETTLEMENT  
CONFERENCE; AND [PROPOSED]  
ORDER**



1 Plaintiffs ICE Consulting, Inc., Uzair Sattar, and Derick Needham (collectively “Plaintiffs”),  
2 and Defendant Gavin Jensen (“Defendant”), by and through their respective counsel, hereby enter  
3 into this Stipulation for an early referral to a Settlement Conference pursuant to ADR L.R. 7, *et seq.*  
4 The parties have worked in good faith in furtherance of a settlement in this matter, but are now at a  
5 point where they believe further settlement discussions would strongly benefit from a judicial  
6 settlement conference. In the interest of avoiding further attorneys’ fees and costs, the parties seek a  
7 referral to the Court’s Settlement Conference program now, in advance of the December 8, 2016 Case  
8 Management Conference in this matter.

9 WHEREAS, Plaintiffs initiated this matter on August 2, 2016 (Dkt. No. 1);

10 WHEREAS, counsel for Defendant was retained on August 16, 2016;

11 WHEREAS, since August 18, 2016, the parties have discussed settlement in good faith, and  
12 have exchanged draft settlement agreements, but have now reached an impasse;

13 WHEREAS, the parties, due to their limited experience with litigation and the emotional  
14 nature of this litigation, believe that further settlement discussions will benefit from a judicial  
15 settlement conference in place of other ADR options;

16 WHEREAS, the parties believe that only limited additional information and document  
17 exchanges may be necessary to effectuate a productive settlement conference;

18 WHEREAS, in the interest of avoiding incurring additional attorneys’ fees and costs, the  
19 parties request an early referral to a judicial settlement conference in advance of the December 8,  
20 2016 Case Management Conference in this matter; and

21 WHEREAS, while Plaintiffs have proposed continuing all dates on all deadlines and hearings  
22 so that the parties may focus on settlement, Defendant would, at minimum, request that the Court  
23 move forward with the Case Management Conference so that a trial date and other deadlines are set,  
24 and that this matter not be further delayed should the parties be unable to reach a settlement;

25 ACCORDINGLY, THE PARTIES HEREBY STIPULATE to the following:

26 That all parties respectfully request that this matter be assigned to an early judicial settlement  
27 conference as soon as possible;

28 IT IS SO STIPULATED.

1 Date: November 3, 2016

DHILLON LAW GROUP INC.

2 By: /s/ Nitoj P. Singh  
3 Nitoj P. Singh

4 Attorneys for Defendant Gavin Jensen

5  
6 Date: November 3, 2016

NOSSAMAN LLP

7 By: /s/ Andrew C. Crane  
8 Veronica M. Gray  
9 Andrew C. Crane

10 Attorneys for Plaintiffs ICE Consulting, Inc.;  
11 Uzair Sattar; and Derick Needham

12  
13 **ORDER**

14 **PURSUANT TO THE STIPULATION, IT IS SO ORDERED.** This case is referred  
15 to a magistrate judge for an expedited settlement conference. Settlement conference  
16 is to be completed within 30 days, if possible.

17 \_\_\_\_\_  
18 Hon. Edward M. Chen  
19 United States District Judge

