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LINDEMANN LAW FIRM, APC
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Attorneys For Plaintiff
MICHELLE KELLY AND THE INTERIM CLASS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MICHELLE KELLY, an individual, on behalf
of herself and those similarly situated,

v.

BAY AREA TOLL AUTHORITY; GOLDEN
GATE BRIDGE, HIGHWAY AND
TRANSPORTATION DISTRICT; XEROX
STATE AND LOCAL SOLUTIONS, INC., and
DOES 1-100,

Defendants.

Case No. 3:16-cv-06837-RS

**JOINT STIPULATION REGARDING
BRIEFING SCHEDULE ON
DEFENDANTS' MOTIONS TO DISMISS;
~~PROPOSED~~ ORDER
[PRIVACY CLASS ACTION]**

The Honorable Richard Seeborg

1 **STIPULATION**

2 This Stipulation is entered into by and between lead plaintiff, Michelle Kelly (“Plaintiff”)
3 and defendants Bay Area Toll Authority, Golden Gate Bridge, Highway and Transportation
4 District, and Xerox State and Local Solutions, Inc. (collectively, the “Defendants”) by and
5 through their respective attorneys of record.

6 WHEREAS, Plaintiff’s Class Action Complaint (“Complaint”) was removed to this
7 Court on November 28, 2016;

8 WHEREAS, on January 6, 2016, each of the Defendants filed a Motion to Dismiss the
9 Complaint (collectively, the “Motions”);

10 WHEREAS pursuant to Northern District of California Local Rules 7-2 and 7-3, the
11 Parties agree that this Motion involves several questions of law requiring an extended period by
12 which the parties may respond and reply;

13 IT IS HEREBY STIPULATED, pursuant to Northern District of California Local Rules
14 7-2 and 7-3, by and between the undersigned counsel for the parties that:

15 Plaintiff’s oppositions to the Motions (or an amended pleading) shall be filed on or before
16 February 3, 2017;

17 Defendants’ replies in support of their Motions shall be filed on or before February 16,
18 2017;

19 IT IS FURTHER STIPULATED, that by entering into this Stipulation, Defendants are
20 not waiving their right to seek a stay of all discovery in this matter pending the Court’s ruling on
21 Defendants’ Motions to Dismiss, including a stay on providing initial disclosures and engaging
22 in a Rule 26(f) conference.

23
24 DATED: January 19, 2017

LINDEMANN LAW FIRM, APC

25
26 /s/ Blake J. Lindemann
27 BLAKE J. LINDEMANN
28 Attorneys for Plaintiff
MICHELLE KELLY

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DATED: January 19, 2017

LAW OFFICES OF DAREN SCHLECTER

/s/ Daren M. Schlecter
DAREN M. SCHLECTER
Attorneys for Plaintiff
MICHELLE KELLY

DATED: January 24, 2017

LAFAYETTE & KUMAGAI LLP

/s/
REBECCA K. KIMURA
Attorney for Defendants
XEROX STATE AND LOCAL SOLUTIONS,
INC.

DATED: January 19, 2017

HANSON BRIDGETT LLP

/s/
SAMANTHA D. WOLFF
Attorney for Defendants
GOLDEN GATE BRIDGE, HIGHWAY AND
TRANSPORTATION DISTRICT AND BAY
AREA TOLL AUTHORITY

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ECF ATTESTATION

I, Blake J. Lindemann, am the ECF User whose ID and Password are being used to file this document. I attest that concurrence in the filing of this document has been obtained from the signatories.

DATED: January 24, 2017

LINDEMANN LAW FIRM, APC

/s/ Blake J. Lindemann
BLAKE J. LINDEMANN

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 1/25, 2017



THE HONORABLE RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE