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5 Attorneys for Defendants FLUENT, LLC
 served and f/k/a FLUENT, INC.; REWARD ZONE
 6 USA, LLC; REWARDSFLOW LLC; AMERICAN PRIZE
 CENTER, LLC; and MOHIT SINGLA
 7

8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)**

10 MIRA BLANCHARD <i>et al</i> ,)	Case No. 3:17-cv-01551-MMC
)	
11 Plaintiffs,)	STIPULATION AND PROPOSED
)	ORDER CONTINUING RESPONSE
12 v.)	DATE TO ORDER TO SHOW CAUSE/
)	AND MOTION TO REMAND AND
13 FLUENT INC. <i>et al</i> ,)	CONTINUING HEARING TO JUNE 2, 2017
)	
14 Defendants.)	

17 **BACKGROUND / BRIEF PROCEDURAL HISTORY**

18 On September 16, 2016, Plaintiffs Mira Blanchard *et al* filed – but did not serve – a
 19 lawsuit against Fluent LLC, served and f/k/a Fluent Inc., Reward Zone USA LLC, RewardsFlow
 20 LLC, American Prize Center LLC, and Monit Singla (collectively “Fluent”) and other
 21 Defendants in the Superior Court of California, County of San Francisco for violations of Cal.

1 Business & Professions Code § 17529.5. On December 20, 2016, Plaintiffs filed a First
2 Amendment Complaint and served Fluent thereafter.

3 On March 22, 2017, Fluent timely removed the Action to the U.S. District Court for the
4 Northern District of California (Docket #1). On March 29, 2017, Fluent filed an Answer
5 (Docket #15).

6 Also on March 29, 2017, Defendant Saughtware Inc. filed a Motion to Dismiss the FAC
7 (Docket #14).

8 On April 3, 2017, Plaintiffs filed a Motion to Remand the Action on substantive and
9 procedural grounds (Docket #16). On April 4, 2017, this Court issued its own Order Directing
10 Fluent to Show Cause Why Action Should Not Be Remanded [and] Continuing Hearing on
11 Saughtware Inc.'s Motion to Dismiss (Docket #18).

12 With respect to the Court's Order to Show Cause, Fluent is diligently investigating the
13 citizenship of the defendants who are not within the collective definition of Fluent, or defendants
14 Saughtware to fully respond to the Court's Order. Unfortunately, the investigation is taking
15 longer than anticipated, and additional time is needed.

16 On April 14, 2017, Fluent's counsel and plaintiffs' counsel agreed that an additional three
17 weeks was appropriate and reasonable given the number of defendants involved, as well as
18 plaintiffs' own efforts in alleging citizenship. Since the Order to Show Cause essentially
19 subsumes some of the points in the pending Motion to Remand, it was agreed that it would be
20 appropriate to request that the response to the Order to Show Cause, Opposition to the Motion to
21 Remand, and Hearing on the Motion to Remand, all be continued for three weeks.

1 **STIPULATION**

2 Based on the foregoing, the parties hereby stipulate and agree to a three week
3 continuance of the deadlines and motion hearing date. Fluent’s Opposition to the Motion to
4 Remand and Response to the Order to Show Cause, presently due on April 17, 2017 will now be
5 due to be filed no later than May 8, 2017. The hearing on plaintiffs’ motion to remand will be
6 continued from May 12, 2017 to June 2, 2017, or the next available date for the Court.

7 THE LAW OFFICES OF DANIEL BALSAM

8 /s/ Daniel L. Balsam
Daniel L. Balsam
9 Attorney for Plaintiffs

10 GORDON & REES LLP

11 /s/ Andrew D. Castricone
12 Andrew D. Castricone
13 Attorney for Fluent Defendants

14 **ATTESTATION**

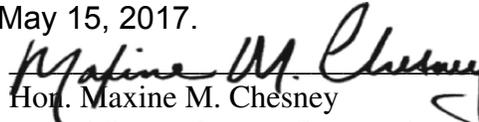
15 In accordance with Civ.L.R. 5-1(i)(3), I attest that concurrence in the filing of this
16 document has been obtained from the other signatory.

17 /s/ Andrew D. Castricone
18 Andrew D. Castricone

19 **PROPOSED ORDER**

20 PURSUANT TO STIPULATION, IT IS SO ORDERED. It is further ordered that plaintiffs’
21 reply, if any, shall be filed no later than May 15, 2017.

22 Dated: April 14, 2017

23 
24 Hon. Maxine M. Chesney
United States District Court Judge