

1 Michael G. Miller (SBN 136491)
miller@perryllaw.net
2 Nicole M. Jaffee (SBN 255944)
jaffee@perryllaw.net

KATHERINE S. CATLOS (SBN 184227)
kcatlos@kdvlaw.com
BRANDON KAHOUSH (SBN 311560)
bkahoush@kdvlaw.com

3 PERRY, JOHNSON, ANDERSON,
4 MILLER & MOSKOWITZ, LLP
438 1st Street, 4th Floor
5 Santa Rosa, California 95401
Telephone: (707) 525-8800
6 Facsimile: (707) 545-8242

KAUFMAN DOLOWICH & VOLUCK, LLP
425 California Street, Suite 2100
San Francisco, California 94104
Telephone: (415) 926-7600
Facsimile: (415) 926-7601

7 Attorneys for Plaintiff
THOMAS R. KELLY

Attorneys for Defendants
WORTH HOLDINGS, LLC,
E.S. WEST COAST, LLC,
ENERGY SYSTEMS

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

12
13 THOMAS R. KELLY
14 Plaintiff,

15 v.

16 WORTH HOLDINGS, LLC; E.S. WEST
COAST, LLC individually and doing
17 business as ENERGY SYSTEMS and
DOES 1-20,
18 Defendants.

) Case No.: 3:17-cv-02466-EMC
)
) Action Filed: March 28, 2017
)

) **STIPULATION AND [PROPOSED]**
) **ORDER TO CONTINUE CASE**
) **MANAGEMENT CONFERENCE AND**
) **RELATED DEADLINES**

) Date: December 8, 2017
) Time: 2:00 p.m.
) Courtroom: 5, 17th Floor
) Judge: Hon. Edward M. Chen
)
)

1 This Stipulation is entered into by and among Plaintiff Thomas R. Kelly (“Plaintiff”)
2 and Defendants E.S. West Coast, LLC dba Energy Systems and Worth Holdings, LLC
3 (collectively referred to as “Defendants”), by and through their respective counsel.

4 WHEREAS, on November 20, 2017, the Court entered a Notice (Docket Number 28)
5 continuing the Further Case Management Conference, initially set for December 7, 2017 to
6 December 8, 2017 at 2:00 p.m. in Courtroom 5;

7 WHEREAS, pursuant to the foregoing Notice, a Joint Case Management Statement is
8 currently due by December 1, 2017;

9 WHEREAS, Plaintiff’s counsel, Michael G. Miller, has a scheduled deposition to
10 commence on December 8, 2017 at 9:00 a.m. in Santa Rosa in another matter which cannot be
11 rescheduled due to an upcoming trial date. The deposition will last at least six hours, which
12 would not allow enough time for Mr. Miller to travel to San Francisco for the Further Case
13 Management Conference on December 8, 2017;

14 WHEREAS, Mr. Miller and Defendants’ counsel, Brandon Kahoush, are both
15 available to attend a Further Case Management Conference on December 21, 2017 at 1:30
16 p.m. in Courtroom 5;

17 WHEREAS the parties agree that the continuance of the Case Management
18 Conference and all related deadlines is necessary;

19 NOW, THEREFORE, pursuant to Local Rule 6-2(a), the Parties hereby stipulate and
20 agree, through their respective counsel, as follows:

21 1. The December 8, 2017 Further Case Management Conference shall be taken off
22 calendar and rescheduled to December 21, 2017 at ~~1:30~~ ^{10:30} a.m., or another date that is
23 convenient to the Court.

24 2. The deadline to file the Joint Case Management Conference shall be continued
25 to and including December 14, 2017.

26 ///

27 ///

1 **IT IS SO STIPULATED**

2 DATED: November 27, 2017

3 PERRY, JOHNSON, ANDERSON,
4 MILLER & MOSKOWITZ, LLP

KAUFMAN DOLOWICH
& VOLUCK, LLP

5 /s/ Michael G. Miller

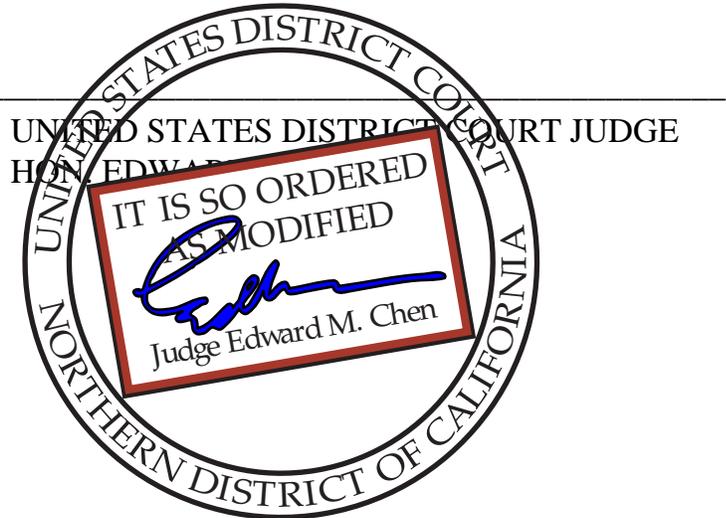
/s/ Brandon Kahoush

6 Michael G. Miller
7 Attorneys for Plaintiff
8 THOMAS R. KELLY

Brandon Kahoush
Attorneys for Defendants
WORTH HOLDINGS, LLC, E.S. WEST
COAST, LLC, ENERGY SYSTEMS

9 **PURSUANT TO STIPULATION, IT IS SO ORDERED** (Revised above)

10 DATED: 11/27, 2017



11 UNITED STATES DISTRICT COURT JUDGE
12 HONORABLE EDWARD M. CHEN

