1	Matthew Righetti, (State Bar No. 121012)	
2	matt@righettilaw.com John Glugoski, (State Bar No. 191551)	
3	jglugoski@righettilaw.com Michael Righetti, (SBN 258541)	
	mike@righettilaw.com	
4	RIGHETTI GLUGOSKI, P.C.	
5	456 Montgomery Street, Suite 1400 San Francisco, California 94104	
6	Telephone: (415) 983-0900	
7	Telefax: (415) 397-9005	
8	Charles H. Horn, (State Bar No 63362) Charles.Horn@leclairryan.com	
9	Joanne Madden, (State Bar No 209095) Joanne.Madden@leclairryan.com	
	LECLAIRRYAN, LLP	
10	44 Montgomery Street, Suite 3100 San Francisco, California 94104-4705	
11	Telephone: (415) 391-7111 Telefax: (415) 391-8766	
12		
13	Attorneys for Defendants PROPARK AMERICA WEST, LLC;	
14	JOHN STEELE; MICHAEL HEWITT;	
15	and RYAN DREISBACH	
16	UNITED STATES DISTRICT COURT	
17	NORTHERN DISTRICT OF CALIFORNIA	
18	SAN FRANCISCO DIVISION	
19	AARON SADINO, individually, and on	Case No. 3:17-cv-06018-JST
20	behalf of all others similarly situated,	Assigned to Hon. Jon S. Tigar
21	Plaintiff,	CLASS ACTION
22	V.	JOINT REQUEST TO EXTEND ADD
23	PROPARK AMERICA WEST, LLC;	
24	JOHN STEELE; MICHAEL HEWITT; RYAN DREISBACH; and DOES 1	Complaint Filed: July 18, 2017 FAC Filed: August 28, 2017
25	through 50, inclusive,	
26	Defendants.	
27		
28		

Plaintiff Aaron Sadino ("Plaintiff") and Defendants ProPark America West, LLC, John Steele, Michael Hewitt, and Ryan Dreisbach (collectively, "Defendants"), hereby submit this Joint Request to Extend the Deadline to Submit an ADR Certificate and Stipulation to ADR Process until after the Court rules on the Motion to Remand.

The parties are amenable to mediating the matter. Whether a court or private mediator is agreed upon would depend on if the matter remains in federal court. Further, the parties are in the process of determining what discovery is necessary before mediation can take place, and whether an informal exchange to facilitate an early resolution is possible.

Accordingly, the parties jointly request that the Court extend the deadline to Submit an ADR Certificate and Stipulation to ADR Process until 30 days after the Court rules on the Motion to Remand.

DATED: March 19, 2018 RIGHETTI GLUGOWSKI, P.C.

By: /s/ Michael Righetti
Michael Righetti
Attorneys for Plaintiff
Aaron Sadino

DATED: March 19, 2018 LECLAIRRYAN, LLP

By: /s/ Joanne Madden

Charles H. Horn
Joanne Madden
Attorneys for Defendant,
PROPARK AMERICA WEST, LLC;
JOHN STEELE; MICHAEL HEWITT;
and RYAN DREISBACH



## **ATTESTATION OF E-FILED SIGNATURES** I, Joanne Madden, am the ECF user whose ID and password are being used to file this Joint Request to Extend ADR Deadline. In compliance with Civil Local Rule 5-1, I hereby attest that Michael Righetti has concurred in this filing. DATED: March 19, 2018 /s/ Joanne Madden By: JOANNE MADDEN