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14 **UNITED STATES DISTRICT COURT**
 15 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 16 **SAN FRANCISCO DIVISION**

17 TRUSTEES OF THE TEAMSTERS BENEFIT
 18 TRUST,

19 Plaintiffs,

20 v.

21 LEONARD TRANSPORT, LLC, PACIFIC
 22 COAST TRANSPORT, LLC, KATHIE
 FAUPEL, and MICHAEL LEONARD,

23 Defendants.

Case No. 17-CV-06648 JST

[Hon. Jon S. Tigar]

**JOINT STIPULATION FOR STAY
 PENDING MEDIATION**

Complaint Filed: November 17, 2017

24 Plaintiffs Trustees of the Teamsters Benefit Trust and Defendants Leonard Transport, LLC,
 25 Pacific Coast Transport, LLC, Kathie Faupel, and Michael Leonard (together, the “Parties”), by and
 26 through their respective counsel, hereby stipulate and agree as follows, subject to Court approval.

27 WHEREAS, the Parties have agreed to submit this dispute to mediation before mediator
 28 Robert Hirsch, of the Law Offices of Robert Hirsch, in San Francisco. The Parties have scheduled a

1 mediation session on August 20, 2018, and collectively are optimistic about the ability to resolve the
2 case.

3 WHEREAS, the Parties believe that in order to maximize the likelihood of settlement, it is
4 necessary for the parties to focus on the production and review of documents being produced as part
5 of the mediation, and on researching and preparing comprehensive mediation briefs.

6 WHEREAS, the Parties believe that in order to maximize the likelihood of a successful
7 mediation, the Parties should focus on tasks related to the mediation, instead of engaging in further
8 law and motion practice, such as a renewed Rule 12(b)(6) motion and potential motions to compel.

9 WHEREAS, the Parties have met and conferred and agree that a stay up to December 15,
10 2018, may result in the ultimate resolution of the dispute. The Parties believe that extending the stay
11 for a brief period following the mediation date will allow time for any necessary post-mediation
12 discussions.

13 WHEREAS, the Parties agree that given the requested stay, the current case management
14 schedule should be vacated and reset.

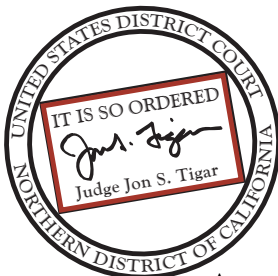
15 WHEREAS, if the Parties are unable to resolve the matter, the Parties agree to submit a
16 proposed revised case management schedule to the Court no later than December 21, 2018.

17 IT IS HEREBY STIPULATED AND AGREED, by and through the parties' respective
18 counsel, as follows:

- 19 1. The action is hereby stayed until December 15, 2018;
- 20 2. The current case management schedule is vacated; and
- 21 3. No later than December 21, 2018, the Parties shall file a proposed revised case
22 management schedule or notice of settlement.

23
24 Dated: August 15, 2018

BEESON, TAYER & BODINE, APC



25
26 By: /s/ Stephanie Platenkamp
27 STEPHANIE PLATENKAMP
28 Attorneys for Trustees of the Teamsters Benefit Trust

August 16, 2018

1 Dated: August 15, 2018

EMPLOYMENT RIGHTS ATTORNEYS

2
3 By: /s/ Richard D. Schramm
RICHARD D. SCHRAMM

4 Attorneys for Leonard Transport, LLC, Pacific
5 Coast Transport, LLC, Kathie Faupel, and
Michael Leonard

6 **L.R. 5-1(i)(3) Statement**

7 I, Stephanie Platenkamp, attest that all signatories listed herein, and on whose behalf this
8 filing is submitted, concur in this filing's content and have authorized this filing.

9
10 /S/
Stephanie Platenkamp, Esq.