

- 1 B. The Complaint was served on Defendant on December 28, 2017.
- 2 C. On January 16, 2018, Plaintiff and Defendant agreed to extend the time for
- 3 Defendant to answer, move with respect to, or otherwise respond to the Complaint
- 4 to February 20, 2018.
- 5 D. On January 23, 2018, the Court scheduled a Case Management Conference for
- 6 March 28, 2018 at 2:00 p.m.
- 7 E. Plaintiff and Defendant have now agreed to further extend the deadline for
- 8 Defendant to answer, move with respect to, or otherwise respond to the Complaint
- 9 by an additional 30 days to March 22, 2018.
- 10 F. In addition, to the extent Defendant moves to dismiss the Complaint, Plaintiff and
- 11 Defendant agree to set (i) April 12, 2018 as the deadline for Plaintiff to file an
- 12 opposition to Defendant's motion to dismiss and (ii) May 3, 2018 as the deadline
- 13 for Defendant to file a reply in further support of Defendant's motion to dismiss.

14 **Terms of Stipulation**

- 15 1. The time for the Defendant to answer, move with respect to, or otherwise respond
- 16 to the Complaint shall be extended through and including March 22, 2018.
- 17 2. To the extent Defendant moves to dismiss the Complaint, Plaintiff and Defendant
- 18 shall comply with the following schedule: (i) April 12, 2018 as the deadline for
- 19 Plaintiff to file an opposition to Defendant's motion to dismiss; and (ii) May 3,
- 20 2018 as the deadline for Defendant to file a reply in further support of Defendant's
- 21 motion to dismiss.

22 **IT IS SO STIPULATED.**

23 Dated: February 16, 2018

**FARMER BROWNSTEIN JAEGER & GOLDSTEIN
LLP**

24
25 By: /s/ David C. Brownstein

26 David C. Brownstein
27 Attorney for Defendant
28 American Express Company

1
2 Dated: February 16, 2018

BOTTINI & BOTTINI, INC.

3 By: /s/ Albert Y. Chang

4 Albert Y. Chang

5 Francis A. Bottini, Jr. (SBN 175783)

6 Albert Y. Chang (SBN 296065)

7 Yury A. Kolesnikov (SBN 271173)

8 7817 Ivanhoe Avenue, Suite 102

9 La Jolla, California 92037

10 Telephone: (858) 914-2001

11 Facsimile: (858) 914-2002

12 Email: fbottini@bottinilaw.com

13 achang@bottinilaw.com

14 ykolesnikov@bottinilaw.com

15 **THE SHUMAN LAW FIRM**

16 Kip B. Shuman (SBN 145842)

17 1 Montgomery Street, Suite 1800

18 San Francisco, California 94104

19 Telephone: (303) 861-3003

20 Facsimile: (303) 536-7849

21 Email: kip@shumanlawfirm.com

22 Attorney for Plaintiff

23 **ATTESTATION PURSUANT TO GENERAL ORDER 45**

24 I, David C. Brownstein, in compliance with General Order 45, Section X(B), hereby
25 attest that I obtained the concurrence of all of the above-listed counsel in filing this
26 document.

27 /s/ David C. Brownstein

28 David C. Brownstein


Attorney for Defendant

American Express Company

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: February 22, 2018



The Honorable Jon S. Tigar
United States District Judge