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8 Attorneys for Defendant  
 HEWLETT PACKARD ENTERPRISE

10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

13 CARLOS ABANTO SHINNO,  
 14 Plaintiff,  
 15 v.  
 16 HEWLETT PACKARD ENTERPRISE,  
 17 Defendant.

Case No. 3:19-cv-07175-RS

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO EXTEND TIME TO  
 RESPOND TO COMPLAINT AND  
 CONTINUE CASE MANAGEMENT  
 CONFERENCE**

Judge: Hon. Richard Seeborg  
 Crtrm.: 3, 17 Floor

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1 Pursuant to Civil Local Rules 6-1, 7-12, and 16-2, Plaintiff Carlos Abanto Shinno  
2 (“Shinno”), and the Defendant Hewlett Packard Enterprise (“HPE”) (collectively, the “Parties”)  
3 jointly submit the following Stipulation.

4 WHEREAS, Plaintiff filed the complaint in this action on October 30, 2019;

5 WHEREAS, on November 26, 2019, the Parties’ filed a joint Stipulation to Extend Time to  
6 Respond to Complaint that continued the deadline for HPE to respond to the Complaint to January  
7 15, 2020;

8 WHEREAS, there is currently a Case Management Conference set for January 30, 2020,  
9 with a Case Management Statement due by January 23, 2020;

10 WHEREAS, the Parties are in active settlement discussions and have agreed to extend the  
11 time for Defendant to answer the Complaint to February 14, 2020;

12 WHEREAS, to conserve the resources of the Court and the Parties while settlement  
13 discussions continue, the Parties stipulate to and request that the Court continue the Case  
14 Management Conference to February 27, 2020 or another date after February 14, 2020 convenient  
15 for the Court;

16 IT IS HEREBY STIPULATED by and between the Parties, as follows:

- 17 • The time for Defendant to answer the Complaint is extended to February 14, 2020.
- 18 • The Case Management Conference set for January 30, 2020 will be continued to  
19 February 27, 2020 or another date set by the Court.
- 20 • A Case Management Statement shall be filed no later than seven days before the  
21 Case Management Conference.

1 Dated: January 13, 2020

BERGESON, LLP

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By:           /s/ Adam C. Trigg            
Adam C. Trigg

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Attorneys for Defendant  
HEWLETT PACKARD ENTERPRISE

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7 Dated: January 13, 2020

MEXICAN AMERICAN LEGAL DEFENSE AND  
EDUCATIONAL FUND

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By:           /s/ Andres Holguin-Flores            
Andres Holguin-Flores

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Attorneys for Plaintiff  
CARLOS ABANTO SINNO

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16 PURSUANT TO STIPULATION, IT IS SO ORDERED

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Honorable Richard Seeborg  
UNITED STATES DISTRICT JUDGE

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          1/13/2020            
DATE

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