

1 BRIAN D. BERRY, CA Bar No. 229893
 brian.berry@ogletree.com
 2 ANDREW M. MASSARA, CA Bar No. 282913
 andrew.massara@ogletree.com
 3 OGLETREE, DEAKINS, NASH, SMOAK &
 STEWART, P.C.
 4 Steuart Tower, Suite 1300
 One Market Plaza
 5 San Francisco, CA 94105
 Telephone: 415-442-4810
 6 Facsimile: 415-442-4870

7 THOMAS A. LIDBURY, IL Bar No. 6211158*
 thomas.lidbury@ogletree.com
 8 OGLETREE, DEAKINS, NASH, SMOAK &
 STEWART, P.C.
 9 155 North Wacker Drive, Suite 4300
 Chicago, IL 60606
 10 Telephone: 312-916-2168
 Facsimile: 312-807-3619
 11 *Admitted Pro Hac Vice

12 Attorneys for Defendant
 PARKER UNIVERSITY
 13 *Attorney names continued on next page*

14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**

16 DR. LAURIE KLEIN, DR. CRAIG MAURER,
 DR. STEVE LIRINGIS AND LISA
 17 LIRINGIS, DR. TODD ANTOVICH AND
 CAROL ANTOVICH, DR. RANDY MANTZ
 18 AND CARLENE MANTZ, DR. PAMELA
 HART, DR. GREG MOLIS, DR. LES
 19 COHEN, DR. KEN CARLE, DR. SHANE
 STAKER AND KELLY STAKER, DR.
 20 KEITH ALEXANDER, BETSY STUMMER,
 DR. JOHN SUTO AND DR. BILLIE SUTO,
 21 DR. JEFFREY FAILING, DR. MICHAEL
 GAGNON, DR. CRAIG LADOW, MIMI H.
 22 DUONG, DR. CRAIG THORNALLY, DR.
 MARK de DUBOVAY AND BARBARA de
 23 DUBOVAY, DR. RONALD B. SANDERS,
 DR. PEGGY ANDERSON, AND DR. PAM
 24 WACHHOLZ AND BOB NESTE,

Case No. 3:20-cv-03194-RS

**STIPULATION TO CONTINUE
 INITIAL CASE MANAGEMENT
 CONFERENCE; ORDER
 AS MODIFIED BY THE COURT**

Complaint Filed: May 9, 2020
 Trial Date: None Set
 Judge: Hon. Richard Seeborg

25 Plaintiffs,

26 v.

27 PARKER UNIVERSITY,

28 Defendant.

1 SBAITI & COMPANY PLLC
Mazin A. Sbaiti, CA Bar No. 275089
2 mas@sbaitilaw.com
Jonathan E. Bridges (*Pro Hac Vice* Motion Forthcoming)
3 Texas Bar No. 1028835
Brad J. Robinson (*Pro Hac Vice* Motion Forthcoming)
4 Texas Bar No. 24058076
2200 Ross Avenue, Suite 4900W
5 Dallas, TX 75201
Telephone: (214) 432-2899
6 Facsimile: (214) 853-4367

7 Attorneys for Plaintiffs

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 Plaintiffs Dr. Laura Klein, *et al.* (“Plaintiffs”) and Defendant Parker University (“Parker”)
2 hereby jointly stipulate as follows:

3 On September 23, 2020, this Court continued the Initial Case Management Conference
4 (“CMC”) from October 8, 2020 to December 10, 2020. Dkt. 22. On October 12, 2020, the Parties
5 stipulated to continue Parker’s Deadline to respond to Plaintiffs’ First Amended Complaint from
6 October 15, 2020 to October 29, 2020. Dkt. 23. On October 29, 2020, Parker filed a Motion to
7 Dismiss for Lack of Jurisdiction (Dkt. 24) and a Motion to Dismiss for Failure to State a Claim
8 (Dkt. 25), both of which were set for hearing on December 3, 2020, prior to the CMC. On
9 November 6, 2020 and pursuant to the stipulation of the Parties, this Court continued the hearing
10 on Parker’s Motions to Dismiss until January 28, 2021. Dkt. 27.

11 To conserve the Court’s and the Parties’ resources, the Parties stipulate to and respectfully
12 request that the Court vacate the CMC currently scheduled for December 10, 2020 and reset the
13 CMC to take place on February 18, 2021. Joint Case Management Statement Due February 11, 2021.
14 All parties shall appear telephonically and must contact Court Conference at (866) 582-6878 at least
15 one week prior to the Conference to arrange their participation.

16 **IT IS SO STIPULATED.**

17 DATED: November 19, 2020

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

18
19 By: /s/ Andrew M. Massara

BRIAN D. BERRY
THOMAS A. LIDBURY
ANDREW M. MASSARA

20
21
22 Attorneys for Defendant
PARKER UNIVERSITY
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: November 19, 2020

SBAITI & COMPANY PLLC

By: /s/ Brad J. Robinson
MAZIN A. SBAITI
JONATHAN E. BRIDGES
BRAD J. ROBINSON

Attorneys for Plaintiffs
DR. LAURIE KLEIN, DR. CRAIG MAURER,
DR. STEVE LIRINGIS AND LISA LIRINGIS,
DR. TODD ANTOVICH AND CAROL
ANTOVICH, DR. RANDY MANTZ AND
CARLENE MANTZ, DR. PAMELA HART,
DR. GREG MOLIS, DR. LES COHEN, DR.
KEN CARLE, DR. SHANE STAKER AND
KELLY STAKER, DR. KEITH ALEXANDER,
BETSY STUMMER, DR. JOHN SUTO AND
DR. BILLIE SUTO, DR. JEFFREY FAILING,
DR. MICHAEL GAGNON, DR. CRAIG
LADOW, MIMI H. DUONG, DR. CRAIG
THORNALLY, DR. MARK de DUBOVAY
AND BARBARA de DUBOVAY, DR.
RONALD B. SANDERS, DR. PEGGY
ANDERSON, AND DR. PAM WACHHOLZ
AND BOB NESTE

SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document
has been obtained from the other signatories.

DATED: November 19, 2020

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

By: /s/ Andrew M. Massara
BRIAN D. BERRY
THOMAS A. LIDBURY
ANDREW M. MASSARA
Attorneys for Defendant
PARKER UNIVERSITY

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IT IS SO ORDERED.

Dated: November 19, 2020



Honorable Richard Seeborg
Judge of the United States District Court,
Northern District of California

45032752.1