

1 IRENE KARBELASHVILI, Esq. (SBN 232223)
 2 IRAKLI KARBELASHVILI, Esq. (SBN 302971)
 3 ALLACCESS LAW GROUP
 4 1400 Coleman Ave Ste F28
 5 Santa Clara, CA 95050
 Telephone: (408) 295-0137
 Fax: (408) 295-0142
 irene@allaccesslawgroup.com
 irakli@allaccesslawgroup.com

6 Attorneys for Plaintiff

7 Peter L. Weber – 218473
 8 PWeber@mpbf.com Keith G. Adams – 240497
 9 KAdams@mpbf.com
 10 MURPHY, PEARSON, BRADLEY & FEENEY 580 California Street, Suite 1100
 11 San Francisco, CA 94104-1001
 Telephone: (415) 788-1900
 Facsimile: (415) 393-8087

12 Attorneys for Defendants,
 13 STONEBRAE HOMEOWNERS ASSOCIATION and HOMEOWNER ASSOCIATION
 SERVICES, INC.

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

16
 17 TINA BOURI; SAMER BOURI; and
 18 BANDALI BOURI, by and through his
 guardian ad litem, LUAY BOURI,

19 Plaintiffs,

20 v.

21 STONEBRAE HOMEOWNERS
 22 ASSOCIATION; and HOMEOWNER
 ASSOCIATION SERVICES, INC.;

23
24 Defendants.

CASE NO. 24-cv-06869-LJC

Civil Rights

STIPULATION AND ~~[PROPOSED]~~
ORDER CONTINUING THE INITIAL
CASE MANAGEMENT CONFERENCE
AND DEFENDANTS’ DEADLINE TO
RESPOND TO PLAINTIFFS’
COMPLAINT

25
 26
 27 **STIPULATION AND ~~[PROPOSED]~~ ORDER CONTINUING THE INITIAL CASE**
 28 **MANAGEMENT CONFERENCE AND DEFENDANTS’ DEADLIEN TO RESPOND TO**
PLAINTIFFS’ COMPLAINT
CASE NO. 3:24-cv-06869-LJC

1 Plaintiffs TINA BOURI; SAMER BOURI; and BANDALI BOURI, by and through his
2 guardian ad litem, LUAY BOURI (“Plaintiffs”) and STONEBRAE HOMEOWNERS
3 ASSOCIATION (“Stonebrae”); and HOMEOWNER ASSOCIATION SERVICES, INC.
4 (“HAS”) (collectively with Stonebrae, “Defendants,” and together with Plaintiff, the “Parties”)
5 stipulate and respectfully request that the Initial Case Management Conference currently
6 scheduled for February 13, 2025 be continue to February 27, 2025 or, alternatively, March 13,
7 2025. The Parties further stipulate that the deadline for Defendants to response to Plaintiffs’
8 complaint be continued from January27, 2025 to February 28, 2025. The Parties believe good
9 cause exists based on the following:

- 10 1. On October 1, 2024, the Court scheduled the Initial Case Management Conference for
11 January 2, 2025.
- 12 2. On December 20, 2024, the Court continued the Initial Case Management Conference to
13 January 23, 2025.
- 14 3. On December 23, 2024, the Parties filed a stipulation continuing Defendants’ response
15 deadline to Plaintiffs’ Complaint to January 27, 2025.
- 16 4. On January 16, 2025, the Court continued the Initial Case Management Conference to
17 February 13, 2025.
- 18 5. Plaintiffs’ counsel is not available on February 13, 2025 due to a prepaid vacation abroad
19 from February 5, 2025 to February 20, 2025.
- 20 6. The Parties are available on February 27, 2025 for the Initial Case Management
21 Conference. Alternatively, the Parties are also available on March 13, 2025, or a date
22 sometime thereafter that is most convenient for the Court.
- 23 7. The Parties are working cooperatively to mediate this case and have filed a stipulation
24 requesting that the matter be referred to mediation. To facilitate the potential for an early
25 resolution, the Parties seek additional time to focus on settlement discussions rather than
26 proceeding immediately with briefing on a Rule 12 motion, which Defendants intend to

27 STIPULATION AND ~~PROPOSED~~ ORDER CONTINUING THE INITIAL CASE
28 MANAGEMENT CONFERENCE AND DEFENDANTS’ DEADLIEN TO RESPOND TO
PLAINTIFFS’ COMPLAINT
CASE NO. 3:24-cv-06869-LJC

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

file. Additional time is also necessary for the Parties to meet and confer regarding the anticipated Rule 12 motion.

8. Lastly, because Plaintiffs’ counsel will be unavailable from February 5, 2025, through February 20, 2025, this period of unavailability overlaps with the briefing deadlines should Defendants file their Rule 12 motion by the current deadline of January 27, 2025.

Respectfully submitted,

Date: January 22, 2025

ALLACCESS LAW GROUP

/s/ Irakli Karbelashvili
IRAKLI KARBELASHVILI, ESQ.
Attorneys for Plaintiffs

Dated: January 25, 2025

MURPHY, PEARSON, BRADLEY & FEENEY

By /s Keith G. Adams
Keith G. Adams

Attorneys for Defendants
STONEBRAE HOMEOWNERS ASSOCIATION
and HOMEOWNER ASSOCIATION SERVICES,
INC.

FILER’S ATTESTATION

Pursuant to Local Rule 5-1, I hereby attest that on January 22, 2025, I, Irakli Karbelashvili, received the concurrence of the signatories in the filing of this document.

/s/ Irakli Karbelashvili
Irakli Karbelashvili

STIPULATION AND ~~PROPOSED~~ ORDER CONTINUING THE INITIAL CASE
MANAGEMENT CONFERENCE AND DEFENDANTS’ DEADLIEN TO RESPOND TO
PLAINTIFFS’ COMPLAINT
CASE NO. 3:24-cv-06869-LJC

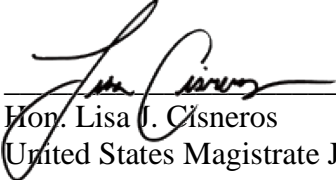
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

~~[PROPOSED]~~ ORDER

Having reviewed the Parties' stipulation, and good cause appearing, the Initial Case Management Conference is continued to March 13, 2025 at 1:30 p.m. The deadline for Defendants to respond to Plaintiffs' complaint is continued to February 28, 2025.

IT IS SO ORDERED.

Dated: January 27, 2025



Hon. Lisa J. Cisneros
United States Magistrate Judge