

1 LOCKE LORD BISSELL & LIDDELL LLP
MICHAEL V. POWELL (TX SBN 16204400) (appearance *pro hac vice*)
2 mpowell@lockelord.com
2200 Ross Avenue, Suite 2200
3 Dallas, Texas 75201-6776
Telephone: (214) 740-8520
4 Facsimile: (214) 756-8520

5 COOPER, WHITE & COOPER LLP
STEPHEN KAUS (SBN 57454)
6 skaus@cwclaw.com
JIE-MING CHOU (SBN 211346)
7 jchou@cwclaw.com
201 California Street, 17th Floor
8 San Francisco, California 94111
Telephone: (415) 433-1900
9 Facsimile: (415) 433-5530

10 Attorneys for DEFENDANT AMERICAN
AIRLINES, INC.

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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

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15 KATHLEEN HANNI, individually and on
behalf of all others similarly situated,
16 TIMOTHY T. HANNI, CHASE L.
COSTELLO, and LANDEN T. HANNI, a
17 minor, by and through his parent and Natural
Guardian, Kathleen Hanni,

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Plaintiffs,

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vs.

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AMERICAN AIRLINES, INC., and DOES 1
21 through 20, inclusive,

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Defendants.

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Pursuant to Civil Local Rule 6-2, Plaintiffs Kathleen Hanni, Timothy Hanni, Chase
25 Costello, and Landen Hanni (collectively "Plaintiffs") and defendant American Airlines, Inc.
26 ("American") hereby stipulate and request that the Court issue an order changing time ("Order")
27 on American's Motion to Compel, filed with this Court on March 3, 2009, which has not yet been
28 set by the Court for hearing. The parties request that American's Motion to Compel, along with

CASE NO. C 08-00732 CW (EDL)

~~STIPULATED REQUEST FOR ORDER~~
CHANGING TIME AS MODIFIED

Local Rule 6-2

1 American's Motion for Sanctions and Plaintiffs' Motion to Compel and Motion for Protective
2 Order (as detailed below) be heard by this Court on March 24, 2009 at 9:00 a.m.

3 1. Whereas, an order shortening time is necessary in this instance because the date by
4 which the Court has ordered the parties to complete all class certification discovery is April 16,
5 2009. (*See* Case Management Order, Docket #110.) The parties wish to have their motions
6 resolved with sufficient time before class certification discovery cutoff date for follow-up
7 discovery if necessary.

8 2. Whereas, the parties request that the Court adopt the following shortened hearing
9 and briefing schedule on American's Motion to Compel:

- 10 a. March 13, 2009 – deadline for Plaintiffs to file opposition brief
11 b. March 18, 2009 – deadline for American to file reply brief
no later than 4:00 p.m.
12 c. March 24, 2009 at 9:00 a.m. – hearing on American's Motion to Compel

13 3. Whereas, American will file its Motion for Sanctions pursuant to Local Rule 37-3
14 on March 11, 2009 and requests that its Motion for Sanctions be heard with its Motion to Compel.
15 Plaintiffs also intend to file a Motion to Compel against American relating to their Request for
16 Production of Documents and a Motion for a Protective Order on March 11, 2009 and request that
17 Plaintiffs' Motion to Compel and Motion for a Protective Order be heard on the same day and time
18 as American's Motion to Compel and Motion for Sanctions for the same reasons cited above. The
19 parties therefore request that the Court adopt the following shortened hearing and briefing
20 schedule on Plaintiffs' Motion to Compel and Motion for Protective Order and American's Motion
21 for Sanctions:

- 22 a. March 11, 2009 – Plaintiffs to file their Motion to Compel and Motion for a
23 Protective Order and American to file its Motion for Sanctions.
24 b. March ~~18~~₁₆, 2009 – parties to file their opposition briefs.
25 c. March ~~20~~₁₈, 2009 – parties to file their reply briefs.
no later than 4:00 p.m.
26 d. March 24, 2009 at 9:00 a.m. – hearing on Plaintiffs' Motion to Compel;

27 4. No other time modifications related to these motions have been requested by the
28 parties.

