

1 VILLARREAL HUTNER PC
 Lara Villarreal Hutner, Esq., Cal. Bar No. 178639
 2 E-Mail: lhutner@vhattorneys.com
 Tracy S. Todd, Esq., Cal. Bar No. 172884
 3 E-Mail: ttodd@vhattorneys.com
 575 Market Street, Suite 300
 4 San Francisco, California 94105
 Telephone: 415.543.4200
 5 Facsimile: 415.512.7674

6 Attorneys for Defendants
 APPLE AMERICAN GROUP LLC and
 7 APPLE NORCAL LLC

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 OAKLAND DIVISION

12 CAESAR OSAKAN, individually, on behalf
 of all other similarly situated persons, and on
 13 behalf of the California Labor and Workforce
 Development Agency and the State of
 14 California,
 15 Plaintiffs,
 16 v.
 17 APPLE AMERICAN GROUP; APPLE
 NORCAL, LLC; and DOES 1-20,
 18 Defendants.
 19

CASE NO. 4:08-cv-04722-SBA

**STIPULATION AND ORDER
 CONTINUING CASE MANAGEMENT
 CONFERENCE AND RELATED DATES
 FOR SIXTY DAYS**

21 Pursuant to Local Rule 6-2 of the United States District Court for the Northern
 22 District of California, it is hereby stipulated and requested by and between the Plaintiff Caesar
 23 Oskan (mistakenly identified as Caesar Osakan in the First Amended Complaint) and Defendants
 24 Apple American Group LLC and Apple Norcal LLC that the Court continue for sixty days the
 25 Case Management Conference, which is currently scheduled for April 14, 2009, and the deadline
 26 by which the parties must file a Joint Status Report, which is currently due on April 7, 2009. The
 27 parties make this request to allow them time to explore potential settlement of this matter and to

1 further meet and confer over issues that could impact this litigation, including two agreements,
2 one being a general release of claims previously executed by Plaintiff for which Defendants
3 provided certain consideration, and the other being an agreement to arbitrate claims. In addition,
4 Defendants have retained new counsel, and a Notice of Substitution of Counsel was filed with the
5 Court on March 23, 2009. A sixty day continuance of these dates will also provide Defendants'
6 new counsel of record time to familiarize themselves further with the case. As a result, the parties
7 wish to preserve judicial resources and avoid any unnecessary law and motion practice in the
8 interim.

9

10 IT IS SO STIPULATED.

11

12 Dated: March 25, 2009

VILLARREAL HUTNER PC

13

14

By: /s/ Lara Villarreal Hutner

15

LARA VILLARREAL HUTNER

16

Attorneys for Defendants

17

APPLE AMERICAN GROUP LLC and

APPLE NORCAL LLC

18

Dated: March 26, 2009

19

KLETTER & PERETZ

20

21

22

By: /s/ Yosef Peretz

23

YOSEF PERETZ

24

Attorney for Plaintiff

25

CAESAR OSKAN

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

ORDER

IT IS HEREBY ORDERED THAT the Case Management Conference currently scheduled for April 14, 2009 shall be CONTINUED to **June 17, 2009 at 3:15 p.m.** The parties shall meet and confer prior to the conference and shall prepare a joint Case Management Conference Statement which shall be filed no later than ten (10) days prior to the Case Management Conference that complies with the Standing Order For All Judges Of The Northern District Of California and the Standing Order of this Court. Plaintiffs shall be responsible for filing the statement as well as for arranging the conference call. All parties shall be on the line and shall call (510) 637-3559 at the above indicated date and time.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

March 26, 2009

By: *Saundra B. Armstrong*
THE HON. SAUNDRA BROWN ARMSTRONG