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10 Attorneys for Defendants
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 11 WOLFGANG'S VAULT, NORTON LLC and
 WILLIAM E. SAGAN
 12

13 **UNITED STATES DISTRICT COURT**
 14 **NORTHERN DISTRICT OF CALIFORNIA**
 15 **OAKLAND DIVISION**

16 ALEXANDER GRAHAM-SULT, an
 individual, and DAVID GRAHAM, an
 17 individual,

18 Plaintiffs,

19 v.

20 NICHOLAS P. CLAINOS, an individual,
 RICHARD L. GREENE, an individual, LINDA
 21 McCALL, an individual, GREENE
 RADOVSKY MALONEY SHARE &
 22 HENNIGH LLP, a limited liability partnership,
 BILL GRAHAM ARCHIVES LLC, d/b/a
 23 WOLFGANG'S VAULT, a limited liability
 company, NORTON LLC, a limited liability
 24 company, and WILLIAM E. SAGAN, an
 individual,

25 Defendants.
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Case No. CV 10-4877 CW

**JOINT STIPULATION AND ORDER TO
 CONTINUE HEARING DATES FOR (1)
 CASE MANAGEMENT CONFERENCE; (2)
 BGA DEFENDANTS' MOTION TO
 DISMISS; (3) GREENE DEFENDANTS'
 MOTION TO DISMISS; AND
 (4) DEFENDANT CLAINOS' MOTION TO
 STRIKE FROM MARCH 10, 2011 TO
 APRIL 7, 2011**

Current Hearing Date: 3/10/2011
Proposed New Hearing Date: 4/7/2011
 Time: 2:00 p.m.
 Place: Courtroom 2, 4th Floor

Complaint Filed: October 27, 2010

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 LA:286740.3

JOINT STIPULATION AND [PROPOSED] ORDER TO CONTINUE CMC AND
 HEARING DATES ON MOTIONS TO DISMISS CV 10-4877 CW

1 The parties to the above entitled action, Plaintiffs Alexander Graham-Sult and David Graham
2 (“Plaintiffs”), Defendants Richard L. Greene, Linda McCall, and Greene Radovsky Maloney Share
3 & Hennigh LLP (the “Greene Defendants”), Nicholas Clainos (“Clainos”), and Defendants Bill
4 Graham Archives LLC d/b/a Wolfgang’s Vault, Norton LLC and William E. Sagan (the “BGA
5 Defendants”), by and through their respective counsel of record, hereby stipulate as follows:

6 WHEREAS, on October 27, 2010, Plaintiffs filed their initial Complaint [Dkt. 1];

7 WHEREAS, on November 24, 2010, the Court scheduled a Case Management Conference
8 for February 15, 2011 [Dkt. 19];

9 WHEREAS, on December 17, 2010, the BGA Defendants filed a Motion to Dismiss, with a
10 hearing date of February 10, 2010 (“BGA Motion”) [Dkt. 23];

11 WHEREAS, on December 22, 2010, the Greene Defendants filed a Motion to Strike and a
12 Motion to Dismiss, with a hearing date of March 10, 2011 (“Greene Motion”) [Dkt. 27 and 28];

13 WHEREAS, on January 4, 2011, the Court served noticed that the Case Management
14 Conference, the BGA Motion and the Greene Motion were all continued to March 10, 2011 at 2:00
15 p.m. [Dkt. 29];

16 WHEREAS, on January 10, 2011, Clainos filed a Motion to Strike, with a hearing date of
17 March 10, 2011 (“Clainos Motion”) [Dkt. 33];

18 WHEREAS, due to scheduling conflicts of the BGA Defendants, the Parties agree to
19 continue the hearing date for the Case Management Conference, the BGA Motion, the Greene
20 Motion and the Clainos Motion from March 10, 2011 to April 7, 2011, at 2:00 p.m. in Courtroom 2,
21 4th Floor, 1301 Clay Street, Oakland, California 94612;

22 WHEREAS, IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned
23 counsel, to continue the Case Management Conference, the BGA Motion, the Greene Motion and
24 the Clainos Motion from March 10, 2011 to April 7, 2011 at 2:00 p.m. in Courtroom 2, 4th Floor,
25 1301 Clay Street, Oakland, California 94612;

26 Plaintiffs’ oppositions to the BGA Motion, the Greene Motion and the Clainos Motion shall
27 be filed and served by March 3, 2011;

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1 Defendants' replies in support of the BGA Motion, the Greene Motion and the Clainos
2 Motion shall be filed and served by March 24, 2011;

3 The deadlines flowing from the date of the Case Management Conference, including the Rule
4 26(f) meet and confer requirement, shall be calculated from the April 7, 2011 Case Management
5 Conference, rather than the previously scheduled Case Management Conference;

6 Plaintiffs and any Defendants remaining in the case shall serve Rule 26 initial disclosures
7 within ten court days of the April 7, 2011 hearings, so no later than April 21, 2011; and

8 No party shall serve discovery on another party until or after April 21, 2011, except by leave
9 of court.

10 Dated: February 2, 2011.

CANNATA CHING & O'TOOLE LLP

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12 By: /s/ Therese Y. Cannata
13 Therese Y. Cannata
14 Michael M. Ching
15 Carolyn A. Johnston
16 Attorneys for Plaintiffs
17 ALEXANDER GRAHAM-SULT and
18 DAVID GRAHAM

16 Dated: February 2, 2011.

COOPER WHITE & COOPER LLP

17
18 By: /s/ Jill Battilega Rowe
19 Jill Battilega Rowe
20 Scott Michael McLeod
21 William Hanson Gill Norman
22 Attorneys for Defendant
23 NICHOLAS P. CLAINOS

22 Dated: February 2, 2011.

HINSHAW & CULBERTSON

23
24 By: /s/ Cassidy E. Chivers
25 Ronald Edward Mallen
26 Cassidy E. Chivers
27 Attorneys for Defendants
28 RICHARD L. GREENE, LINDA McCALL and
GREENE RADOVSKY MALONEY SHARE &
HENNIGH LLP

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Dated: February 2, 2011.

WINSTON & STRAWN LLP

By: /s/ Erin R. Ranahan
Erin R. Ranahan
Michael S. Elkin
Thomas Patrick Lane
Attorneys for Defendants
BILL GRAHAM ARCHIVES LLC, d/b/a
WOLFGANG'S VAULT, NORTON LLC and
WILLIAM E. SAGAN

* * *

In accordance with Civil L.R. 5-4 and General Order No. 45(X)(B), I, Erin R. Ranahan, attest under penalty of perjury under the laws of the United States of America that I have the concurrence of the other signatories to this document.

/s/ Erin R. Ranahan
Erin R. Ranahan

[PROPOSED] ORDER

Pursuant to the Joint Stipulation entered between the Parties, IT IS HEREBY ORDERED that:

- The Case Management Conference, the BGA Motion, the Greene Motion and the Clainos Motion are continued from March 10, 2011 in Courtroom 2, 4th Floor, 1301 Clay Street, Oakland, California 94612 at 2:00 p.m., to April 7, 2011 in Courtroom 2, 4th Floor, 1301 Clay Street, Oakland, California 94612 at 2:00 p.m.;

- Plaintiffs' oppositions to the BGA Motion, the Greene Motion and the Clainos Motion shall be filed and served by March 3, 2011;


- Defendants' replies in support of the BGA Motion, the Greene Motion and the Clainos Motion shall be filed and served by March 24, 2011;

- The deadlines flowing from the Case Management Conference, including the Rule 26(f) meet and confer requirement, shall be calculated from the April 7, 2011 Case Management Conference, rather than the previously scheduled Case Management Conference;

- Plaintiffs and any Defendants remaining in the case shall serve Rule 26 initial disclosures within ten court days of the April 7, 2011 hearings, so no later than April 21, 2011;

- No party shall serve discovery on another party until or after April 21, 2011, except by leave of court.

Dated: 2/3/2011



Hon. Claudia Wilken
United States District Court Judge