

1 HOFFMAN EMPLOYMENT LAWYERS, LLP  
 2 MICHAEL HOFFMAN (State Bar No. 154481)  
 3 100 Pine Street, Suite 1550  
 4 San Francisco, CA 94111  
 Telephone: (415) 362-1111  
 Fax: (415) 362-1112  
 Email: *mhoffman@employment-lawyers.com*

5 Attorneys for Plaintiff  
 6 DAVID IVERSEN

7 MALCOLM A. HEINICKE (State Bar No. 194174)  
 8 CAROLYN V. ZABRYCKI (State Bar No. 263541)  
 MUNGER, TOLLES & OLSON LLP  
 9 560 Mission Street  
 Twenty-Seventh Floor  
 San Francisco, CA 94105-2907  
 Telephone: (415) 512-4000  
 Facsimile: (415) 512-4077  
 E-mail: *Malcolm.Heinicke@mto.com*  
 11 *Carolyn.Zabrycki@mto.com*

12 Attorneys for Defendant  
 13 WELLS FARGO BANK, N.A.

14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA

16 DAVID IVERSEN, on behalf of himself,  
 17 and all others similarly situated

18 Plaintiff,

19 vs.

20 WELLS FARGO BANK, N.A., a  
 corporation, and DOES 1 through 10,  
 inclusive.

21 Defendant.

Case No. CV-10-05566 LB

**STIPULATION AND ~~PROPOSED~~  
 ORDER CONTINUING FURTHER CASE  
 MANAGEMENT CONFERENCE**

Judge: Honorable Laurel Beeler

Current Date: October 6, 2011  
 Proposed Date: December 8, 2011

1 WHEREAS, Plaintiff filed this putative class action alleging state wage and hour claims  
2 concerning his employment at Wells Fargo Bank, N.A.;

3 WHEREAS, the parties previously appeared before this Court at the Initial Case  
4 Management Conference on March 31, 2011 at 10:30 a.m.;

5 WHEREAS, the parties are scheduled to appear at a Further Case Management  
6 Conference on October 6, 2011 at 10:30 a.m.;

7 WHEREAS, the parties have completed their initial meet and confer sessions and have  
8 exchanged initial disclosures;

9 WHEREAS, Wells Fargo Bank, N.A. has responded to written discovery, i.e., numerous  
10 special interrogatories;

11 WHEREAS, the parties have commenced the process of meeting and conferring over  
12 depositions;

13 WHEREAS, the parties respectfully submit that it would be most efficient to conduct a  
14 Further Case Management Conference after discovery has progressed further;

15 WHEREAS, the parties, through their counsel of record, stipulate as follows:

16 IT IS HEREBY STIPULATED that the parties jointly and respectfully request an order  
17 postponing the Further Case Management Conference currently set for October 6, 2011 until  
18 December 8, 2011 at 10:30 a.m. or such other time thereafter that the Court is available.

19 DATED: September 29, 2011

HOFFMAN EMPLOYMENT LAWYERS,  
L.L.P.

21  
22 By:           /s/Michael Hoffman            
23 MICHAEL HOFFMAN

24 Attorneys for Plaintiff DAVID IVERSEN

1 DATED: September 29, 2011

MUNGER, TOLLES & OLSON LLP

2

3

By:                   /s/ Malcolm A. Heinicke                    
MALCOLM A. HEINICKE

4

5

Attorneys for Defendant  
WELLS FARGO BANK, N.A.

6

7

8

Filer's Attestation

9

I, Malcolm A. Heinicke, am the ECF user whose identification and password are being used to file this **STIPULATION AND [PROPOSED] ORDER POSTPONING FURTHER CASE MANAGEMENT CONFERENCE**. In compliance with General Order 45.X.B, I hereby attest that Michael Hoffman concurs in this filing.

10

11

12

13

DATED: September 29, 2011

14

15

                  /s/ Malcolm A. Heinicke                    
MALCOLM A. HEINICKE

16

17

**[PROPOSED] ORDER**

18

19

PURSUANT TO STIPULATION, IT IS SO ORDERED. Specifically, the Court orders that the Further Case Management Conference currently set for October 6, 2011 at 10:30 a.m. is postponed until December 8, 2011 at 10:30 a.m.

20

21

22

DATED: October 4, 2011

23

24

By:                   Laurel Beeler                    
United States Magistrate Judge  
Judge Laurel Beeler

25

26

27

28