

1 SCHIFF HARDIN LLP  
 2 WILLIAM J. CARROLL (CSB #118106)  
 3 [wcarroll@schiffhardin.com](mailto:wcarroll@schiffhardin.com)  
 4 One Market, Spear Street Tower  
 5 Thirty-Second Floor  
 6 San Francisco, CA 94105  
 7 Telephone: (415) 901-8700  
 8 Facsimile: (415) 901-8701

6 Attorneys for Defendants  
 7 MITCHELL CELAYA, HARRY LEGRANDE,  
 8 MARC DECOULODE, and ROBERT J.  
 9 BIRGENEAU

9 UNITED STATES DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA

12 CALLIE MAIDOF, et al.,  
 13 Plaintiffs,  
 14 v.  
 15 MITCHELL CELAYA, HARRY  
 16 LEGRANDE, MARC DECOULODE, and  
 17 ROBERT J. BIRGENEAU,  
 18 Defendants.

Case No. 11-cv-4971 LB

**STIPULATION AND ~~PROPOSED~~  
 ORDER EXTENDING TIME IN  
 WHICH TO ANSWER OR  
 OTHERWISE PLEAD TO  
 COMPLAINT**

19 The parties, by and through their attorneys of record, hereby agree and stipulate as  
 20 follows:

21 Plaintiffs filed the above-captioned complaint on December 27, 2011.

22 Accordingly, Defendants must file an answer or otherwise respond to the complaint by  
 23 January 10, 2012.

24 The parties have agreed to extend the time in which defendants are to answer or otherwise  
 25 respond to the complaint.

26 The parties stipulate that if defendants decide to answer the complaint, their answer will  
 27 be due on or before January 24, 2012.

28 ///

1 The parties stipulate that if defendants decide to file a motion to dismiss the complaint,  
2 pursuant to Fed.R.Civ.P. 12(b), the following briefing schedule would be in effect:

3 Defendants will file their opening brief on or before January 24, 2012.

4 Plaintiffs will file their response brief on or before February 14, 2012.

5 Defendants will file their reply brief on or before February 28, 2012.

6 The parties request a hearing date of April 5, 2012.

7 **IT IS SO STIPULATED.**

8 Dated: January 9, 2012

SCHIFF HARDIN LLP

9 By: /s/ William J. Carroll  
10 WILLIAM J. CARROLL  
11 Attorneys for Defendants MITCHELL  
12 CELAYA, HARRY LEGRANDE, MARC  
13 DECOULODE, and ROBERT J.  
14 BIRGENEAU

15 Dated: January 9, 2012

SIEGEL & YEE

16 By: /s/ Daniel Siegel  
17 DANIEL SIEGEL  
18 Attorneys for Plaintiffs

19 I attest and certify under Northern District General Order 45(x) that I received permission  
20 from plaintiffs' counsel before e-filing this document and will retain proof of this permission in  
21 compliance with 45(x).

22 Dated: January 9, 2012

SCHIFF HARDIN LLP

23 By: /s/ William J. Carroll  
24 WILLIAM J. CARROLL  
25 Attorneys for Defendants MITCHELL  
26 CELAYA, HARRY LEGRANDE, MARC  
27 DECOULODE, and ROBERT J.  
28 BIRGENEAU

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

29 DATED: January 11, 2012

  
30 Hon. Laurel Beeler  
31 United States Magistrate Judge

SF320118501.1