

1 William I. Rothbard (SBN 72447)  
2 **LAW OFFICES OF WILLIAM I. ROTHBARD**  
3 1217 Yale Street, Suite 104  
4 Santa Monica, California 90404  
5 Telephone: 310-453-8713  
6 Facsimile: 310-453-8715  
7 Bill@RothbardLaw.com

8 Attorney for Defendant Casting360, LLC

Earle v. Casting360, LLC

Doc. 25

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

10 **VICTORIA EARLE**, Individually and ) **Case Number: 4:13-cv-00877-KAW**  
11 on behalf of a Class of Individuals )  
12 Similarly Situated, )  
13 **Plaintiff,** ) **STIPULATION REGARDING**  
14 **-v-** ) **ENLARGEMENT OF TIME TO FILE AN**  
15 **CASTING360, LLC** ) **ANSWER**  
16 **Defendant** )

17  
18 Through this Stipulation and [Proposed] Order, Plaintiff Victoria Earle (“Named  
19 Plaintiff”) and Defendant Casting 360 LLC (“Defendant”) stipulate that Defendant shall have  
20 until September 30, 2013 to file its Answer, which currently is due on August 30, 2013. This is  
21 the third extension stipulated and proposed by the parties. Plaintiff and Defendant continue to be  
22 in active settlement discussions and will use this additional time to pursue an early settlement.

23 In addition, Plaintiff intends to file a motion to amend the complaint to add another  
24 defendant within the proposed 30 day extension period. If the motion is granted, Defendant also  
25 would have to answer the amended complaint. Approval of this stipulated extension will relieve  
26 Defendant of the need to answer the original complaint and then have to turn around and file a  
27 superceding answer to the amended complaint a short time later.  
28

1 ACCORDINGLY, the parties respectfully request that their joint request for an  
2 enlargement of time for Defendant to file an answer to the complaint, from August 30, 2013 to  
3 and including September 30, 2013, be granted.

4 Dated: August 30, 2013

5 Respectfully submitted,

6 /s/ Barbara Quinn Smith  
7 Barbara Quinn Smith (Ohio Bar 0055328)

8 Daniel E. Birkhaeuser (SBN 136646)  
9 dbirkhaeuser@bramsonplutzik.com  
10 Jenelle Welling (SBN 209480)  
11 jwelling@bramsonplutzik.com  
12 BRAMSON, PLUTZIK, MAHLER  
13 & BIRKHAEUSER, LLP  
14 2125 Oak Grove Rd., #120  
15 Walnut Creek, CA 94598  
16 Telephone: 925-945-0200  
17 Facsimile: 925-945-8792

18 ATTORNEYS FOR PLAINTIFF

19 /s/ William I. Rothbard  
20 William I. Rothbard (SBN 72447)  
21 Bill@RothbardLaw.com

22 LAW OFFICES OF WILLIAM I. ROTHBARD  
23 1217 Yale Street, Suite 104  
24 Santa Monica, California 90404  
25 Telephone: 310-453-8713  
26 Facsimile: 310-453-8715

27 ATTORNEY FOR DEFENDANT CASTING 360  
28 LLC

29 PURSUANT TO STIPULATION, IT IS SO ORDERED.

30 Dated: 9/3/13

31   
32 UNITED STATES JUDGE