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5 Attorney for Plaintiffs IRMA RAMIREZ;
 and DAREN HEATHERLY

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 7 **UNITED STATES DISTRICT COURT**
 8 **NORTHERN DISTRICT OF CALIFORNIA**
OAKLAND - DIVISION

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 10 IRMA RAMIREZ; and DAREN)
 HEATHERLY,)
 11 Plaintiffs,)
 12 v.)
 13)
 14 EARTHSONG; WILLIAM K. KENNEDY)
 and ALYCIA F. KENNEDY, Trustees of the)
 15 KENNEDY FAMILY 2004 REVOCABLE)
 TRUST, dated 4/29/2004; and BRUCE)
 16 BECKER, an individual dba EARTHSONG,))
 17 Defendants.)

CASE NO. CV-13-4039-KAW
STIPULATION RE CONTINUING
DEADLINE FOR THE PARTIES TO
CONDUCT THE JOINT SITE
INSPECTION; and ~~[PROPOSED]~~ ORDER
THEREON

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 20 Plaintiffs IRMA RAMIREZ and DAREN HEATHERLY, and Defendants WILLIAM K.
 21 KENNEDY and ALYCIA F. KENNEDY, Trustees of the KENNEDY FAMILY 2004
 22 REVOCABLE TRUST, dated 4/29/2004; and BRUCE BECKER, an individual dba
 23 EARTHSONG, by and through their respective counsel, respectfully request and stipulate, as
 24 follows:

25 1. **Whereas**, all defendants have been served with the summons and complaint and
 26 have answered plaintiffs' complaint;

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28 **STIPULATION RE CONTINUING DEADLINE FOR THE PARTIES TO CONDUCT THE JOINT SITE INSPECTION; and**
[PROPOSED] ORDER THEREON

CASE NO. CV-13-4039-KAW

1 2. **Whereas**, pursuant to General Order 56, ¶3,4, the parties were to have the Joint
2 Site Inspection at the Earthsong retail store, located at/near 1701 Haight Street, San Francisco,
3 California 94117 completed by no later than December 12, 2013. However, due to scheduling
4 conflicts and the holidays, the parties were unable to conduct the General Order 56 Joint Site
5 Inspection;

6 3. **In light of the above**, the parties have agreed to conduct the joint site inspection
7 on February 13, 2014.

8 **IT IS SO STIPULATED:**

9 That, plaintiffs IRMA RAMIREZ and DAREN HEATHERLY, and defendants
10 WILLIAM K. KENNEDY and ALYCIA F. KENNEDY, Trustees of the KENNEDY FAMILY
11 2004 REVOCABLE TRUST, dated 4/29/2004; and BRUCE BECKER, an individual dba
12 EARTHSONG agree, stipulate and respectfully request that the last day for the parties and
13 counsel to conduct the General Order 56 Joint Site Inspection of the premises be continued up to
14 and including February 18, 2014.

15 This stipulation may be executed in counterparts, and all executed counterparts shall
16 constitute an agreement which shall be binding upon all parties hereto, notwithstanding that the
17 signatures of all of the parties’ designated representatives do not appear on the same page.
18 Photocopies and facsimile shall have the same force and effect as originals.

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20 Respectfully submitted,

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22 Dated: January 23, 2014

THOMAS E. FRANKOVICH, Esq.

23 ***A PROFESSIONAL LAW CORPORATION***

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25 By: ___ /s/Thomas E. Frankovich _____

Thomas E. Frankovich, Esq.

26 Attorney for Plaintiff IRMA RAMIREZ; and
27 Plaintiff DAREN HEATHERLY

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///

1 Dated: January 23, 2014

Jason G. Gong, Esq.,

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LAW OFFICES OF JASON G. GONG

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By: _____/s/Jason G. Gong_____
Jason G. Gong, Esq.

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Attorney for Defendants WILLIAM K. KENNEDY
and ALCIA F. KENNEDY, Trustees of the
KENNEDY FAMILY 2004 REVOCABLE TRUST,
dated 4/29/2004

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Dated: January 23, 2014

LITTLER MENDELSON, P.C.,

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By: _____/s/Joanna L. Brooks_____
Joanna L. Brooks

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Attorney for Defendant BRUCE BECKER, an
individual dba EARTHSONG

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PROPOSED ORDER

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IT IS SO ORDERED, that the last day for the parties and counsel to conduct the joint site

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inspection of the premises be continued up to and including February 18, 2014.

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Dated: January 24, 2014



Honorable Kandis A. Westmore

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United States Magistrate Judge of California

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