1 2 3 4	THOMAS E. FRANKOVICH (State Bar No. 074414) THOMAS E. FRANKOVICH, <i>A PROFESSIONAL LAW CORPORATION</i> 1832-A Capitol Street Vallejo, CA 94590 Telephone: (415) 444-5800 Facsimile: (415) 674-9900		
5 6 7	Attorney for Plaintiffs IRMA RAMIREZ and DAREN HEATHERLY		
, 8	UNITED STATES DISTRICT COURT		
	NORTHERN DISTRICT OF CALIFORNIA		
9 10) CASE NO. CV14-04012-KAW DAREN HEATHERLY; and IRMA)		
11	RAMIREZ, () STIPULATION and [PROPOSED]-ORDER) TO CONTINUE CASE MANAGEMENT		
12	Plaintiffs,		
13	V.)		
14 15 16	GREAT CHINA; JOSEPH MURPHY) CORP., a California Corporation; and) CHEN CHENG KUNG and KIM KUNG,) dba GREAT CHINA,)		
17 18	Defendants.		
19			
20	Plaintiffs DAREN HEATHERLY and IRMA RAMIREZ, and defendants JOSEPH		
21	MURPHY CORP., a California Corporation; and CHEN CHENG KUNG and KIM KUNG, dba		
22	GREAT CHINA, by and through their respective attorney of record, hereby stipulate to continue		
23	the Case Management Conference currently set for December 1, 2015 at 1:30 p.m.		
24	1. Whereas , plaintiffs counsel, Thomas E. Frankovich, will be out of state on a pre-		
25	paid vacation from November 26, 2015 through December 8, 2015.		
26	2. Whereas, plaintiffs' counsel's office will be closed for the holidays from		
27	December 21, 2015 through January 4, 2016.		
28			
	STIPULATION and [PROPOSED] ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE		
	Docket		

1	3. Therefore , the parties respec	ctfully request that the Case Management
2	Conference currently scheduled for December 1, 2015, at 1:30 p.m. be continued to sometime at	
3	the end of January 2016 and/or to a date that	t is convenient to the Court.
4	IT IS SO STIPULATED.	
5	This stipulation may be executed in	counterparts and have the same force and effect as
6	though all signatures are on the same and/or consecutive pages. Photocopies and facsimile shall	
7	have the same force and effect as originals.	
8		Respectfully submitted,
9		Respectfully submitted,
10	Dated: November 23, 2015	THOMAS E. FRANKOVICH, A PROFESSIONAL LAW CORPORATION
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12		By: /s/Thomas E. Frankovich
13		Thomas E. Frankovich Attorney for Plaintiffs IRMA RAMIREZ; and
14		DAREŇ HEATHERLY
15	Dated: November 23, 2015	CLEMENT, FITZPATRICK &
16		KENWORTHY PC
17		
18		By: <u>/s/ Peter C. De Golia</u> Peter C. De Golia
19		Attorney for Defendants JOSEPH MURPHY CORP., a California Corporation; and CHEN
20		CHENG KUNG and KIM KUNG, dba GREAT
21		CHINA
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	STIPULATION and [PROPOSED] ORDI	ER TO CONTINUE CASE MANAGEMENT CONFERENCE

1	[PROPOSED] ORDER	
2	IT IS SO ORDERED that the Case Management Conference set for December 1, 2015,	
3	at 1:30 p.m., is vacated and/ or continued to <u>January 26</u> , 2016, at <u>1:30</u> a.m./ p.m.	
4	The parties shall file a Joint Case Management Statement no later than seven (7) days prior to	
5	the	
6	Conference.	
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8	\vee (1)	
9	Dated: November 24, 2015	
10	Kandis A. Westmore United States Magistrate Judge	
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	STIPULATION and [PROPOSED] ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE	