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6	Attorneys for Defendant	
7	BEAVĚX INCORPORATED	
8	UNITED STATE	S DISTRICT COURT
9	NORTHERN DIST	RICT OF CALIFORNIA
10	OAKLAND	COURTHOUSE
11	LEOBARDO LOPEZ, individually and on	Case No. 4:15-CV-00550-JSW
12	behalf of himself and all others similarly situated,	CTIDIU ATION AND IDDODOCEDI
13	Plaintiff,	STIPULATION AND [PROPOSED] ORDER POSTPONING CASE MANAGEMENT CONFERENCE AND
14	V.	RELATED DEADLINES
15	REAVEY INC. a Georgia corporation	
16	BEAVEX, INC., a Georgia corporation, LOWERS RISK GROUP, LLC, dba PROFORMA SCREENING SOLUTIONS, a	
17	Virginia limited liability corporation, and Does 1 through 100, inclusive,	
18	Defendants.	
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28 LITTLER MENDELSON, P.C.		CAGENIO A 15 CV 00550 YOW
650 California Street 20th Floor San Francisco, CA 94108.2693	STIP/ORDER POSTPONING C	CASE NO. 4:15-CV-00550-JSW CMC AND RELATED DEADLINES
415.433.1940		

1	IT IS HEREBY STIPULATED AND REQUESTED by and between the parties who have
2	to date appeared in this action, through their counsel of record, Michael D. Singer and Jennifer L
3	Connor of Cohelan Khoury & Singer and the Law Offices of Shaag Majarian II, attorneys for
4	Plaintiff LEOBARDO LOPEZ ("Plaintiff"); Rod M. Fliegel and Alison S. Hightower of Littler
5	Mendelson, P.C., attorneys for Defendant BEAVEX, INCORPORATED and Robert J. Romero
6	Edward F. Donohue and David I. Dalby for Defendant LFL Enterprises, LLC, dba Proforma
7	Screening Solutions (collectively "Defendants"), based upon the following recitals:
8	1. WHEREAS on April 14, 2015 Defendants filed a motion to transfer venue to the
9	Northern District of Georgia set to be heard on the first available date, May 22, 2015 (Doc. 20);
10	2. WHEREAS this case is currently set for a Case Management Conference on May 8
11	2015 – two weeks before the hearing on the motion to transfer venue – and the parties are required to
12	file a Joint Case Management Statement and make initial disclosures pursuant to Rule 26(a)(1)(C) by
13	May 1, 2015, and to meet and confer pursuant to Rule 26(f) by April 17, 2015;
14	3. WHEREAS, a transfer of venue likely will result in additional or different case
15	management schedules and requirements, and thus a modest delay on these obligations will further
16	efficient and effective case management and thus serve the interests of economy for the Court and all
17	Parties;
18	STIPULATION
19	Pursuant to this Court's Standing Order and Civil Rule 16-2(e), so as to promote efficient and
20	effective case management and thus serve the interests of economy for the Court and all Parties, the
21	Parties hereby stipulate, agree and respectfully request:
22	1. That the Case Management Conference, currently set for May 8, 2015, be continued
23	until, 2015, or days after this Court's service of an order or
24	Defendant's Motion To Transfer Venue, assuming that motion is denied;
25	2. The current May 1, 2015 deadline for the parties to file their Joint Case Management
26	Conference Statement is extended until 14 days prior to the new date for this Case Management
27	Conference;
28	///
LSON	1. CASE NO. 4:15-CV-00550-JSW

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LITTLER MENDELSON
A PROFESSIONAL CORPORATION
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CASE NO. 4:15-CV-00550-JSW

1	<u>ORDER</u>	
2	PURSUANT TO STIPULATION, THE COURT HEREBY ORDERS:	
3	1. The Case Management Conference, currently set for May 8, 2015 is continued	
4	until June 5, 2015, or days after this Court's service of an order on	
5	Defendant's Motion to Transfer Venue, assuming that motion is denied;	
6	2. The current May 1, 2015 deadline for the parties to file their Joint Case	
7	Management Conference Statement is extended until 14 days prior to the new date for this Case	
8	Management Conference; and	
9	3. That the last day for the Parties to meet and confer pursuant to this Court's	
10	Standing Order, Civil Rule 16-3 and Federal Rule of Civil Procedure, Rule 26(f)(1) be extended to	
11	one week from the Court's service of an order on Defendant's Motion To Transfer Venue, assuming	
12	the motion is denied;	
13	4. The Parties shall then serve their initial disclosures pursuant to Rule 26 within	
14	14 days of their Rule 26(f) conference; and	
15	5. In the event the Court grants Defendant's pending Motion to Transfer Venue,	
16	these deadlines will be vacated and will be set by the transferee district.	
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18	Dated: April 17, 2015 Dated: April 17, 2015	
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