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Attorney for BARE BOTTLE CORPORATION

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Attorney for Plaintiff
BAREBOTTLE BREWING COMPANY, INC.,
a California Corporation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BAREBOTTLE BREWING COMPANY,
INC.,

Plaintiff,

v.

BARE BOTTLE CORPORATION,

Defendant.

Case No. 4:15-cv-02585-KAW

STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME TO RESPOND
TO COMPLAINT

Courtroom: 4 (3rd Fl.)
Judge: Hon. Kandis A. Westmore

1 Pursuant to Civil Local Rules 6-2 and 7-12, Defendant Bare Bottle Corporation (“Bare
2 Bottle”) and Plaintiff Barebottle Brewing Company, Inc. (“Barebottle Brewing”), by and through
3 their respective counsel of record, hereby stipulate as follows:

4 WHEREAS, Barebottle Brewing served its Complaint on June 18, 2015;

5 WHEREAS, BareBottle and Bare Bottle Brewing stipulated, pursuant to Local Rule 6-1, to
6 an initial extension to respond to the Complaint of August 10, 2015;

7 WHEREAS, Bare Bottle has requested and Barebottle Brewing has consented to an
8 additional 15 days for Bare Bottle’s answer or response to Barebottle Brewing’s complaint;

9 WHEREAS, an additional 15 days for Bare Bottle’s answer or response to Barebottle
10 Brewing’s Complaint will alter the previous stipulated-to deadline to respond to the Complaint;

11 WHEREAS, the additional extension will extend the time to respond to the Complaint past
12 the date for the parties to file their ADR Certification and meet and confer on their initial
13 disclosures;

14 WHEREAS, given this extension, the parties also request an extension of the Initial Case
15 Management Conference, which is presently set for September 8, 2015, until November 10, 2015;

16 WHEREAS, the parties have generally agreed on the parameters of a settlement, and, thus,
17 there is a reasonably strong likelihood that the parties will reach a settlement over the course of the
18 next 15 days.

19 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties,
20 through their respective counsel, that Bare Bottle shall answer or otherwise respond to Barebottle
21 Brewing’s Complaint by August 25, 2015.

22 Dated: August 10, 2015

Respectfully submitted,

23
24 By: /s/ Rachel M. Walsh
Rachel M. Walsh (SBN 250568)
25 GOODWIN PROCTER LLP
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27 Tel.: 415.733.6000
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28 *Attorney for Defendant*

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Dated: August 10, 2015

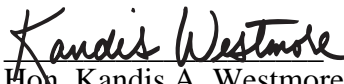
Respectfully submitted,

By: /s/ Jimmie L. Williams
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Attorney for Plaintiff

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 8/10/15


Hon. Kandis A. Westmore
United States Magistrate Judge

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/s/ Rachel M. Walsh
Rachel M. Walsh

1 **CERTIFICATE OF SERVICE**

2 I, Rachel M. Walsh, hereby certify that on August 10, 2015, a true copy of the foregoing
3 Stipulation to Extend Time to Respond to Complaint was served by Notice of Electronic Filing
4 (NEF) upon all other counsel of record in this action.

5
6 August 10, 2015

/s/ Rachel M. Walsh
Rachel M. Walsh