1 Alan J. Jang, SBN 83409 Email: ajang@janglit.com 2 Jennifer A. Stewart, SBN 127812 Email: jstewart@janglit.com 3 JANG & ASSOCIATES, LLP 1766 Lacassie Avenue, Suite 200 4 Walnut Creek, California 94596 Telephone: (925) 937-1400 5 Facsimile: (925) 937-1414 6 Attorneys for Plaintiff, CSAA INSURANCE EXCHANGE 7 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 11 CSAA INSURANCE EXCHANGE as CASE No.: 15-cv-02899-DMR subrogee of Dennis and Mona Verducci HONORABLE DISTRICT JUDGE DONNA M. RYU 12 COURTROOM 4 Plaintiffs, 13 VS. STIPULATION TO CONTINUE ADR 14 **DEADLINE TO JULY 15, 2016 AND ORDER** LG ELECTRONICS U.S.A., Inc.; BEST 15 BUY CO., INC. WHICH WILL DO TRIAL DATE: 12/05/2016 BUSINESS IN CALIFORNIA AS MN 16 BEST BUY CO., INC.; and DOES 1 through 25, inclusive, 17 Defendants. 18 19 TO THIS HONORABLE COURT: 20 The undersigned attorneys for all parties agree and stipulate to request a 90-day 21 continuance of the current mid-April, 2016, alternative dispute resolution ("ADR") 22 deadline to a new ADR deadline of **July 15, 2016**. This request is made to allow new 23 counsel for plaintiff time to get up to speed / conduct discovery prior to mediation. DATE: February , 2016 24 MUSICK, PEELER & GARRETT LLP 25 "see attached email) 26 Cameron W. Thomas 27 Attorneys for Defendant LG Electronics USA 28 STIPULATION TO CONTINUE ADR DEADLINE TO JULY 15, 2016

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3	DATE: February 1, 2016 IT IS SO ORDERED. Dated: February 2, 2016	MANNING & KASS ELLROD, RAMIREZ, TRESTER LLP Melissa L. Grant Attorneys for Defendant BEST BUY CO, INC JANG & ASSOCIATES, LLP Jennifer A. Stewart, Attorneys for Plaintiff, CSAA Insurance EXCHANGE IT IS SO ORDERED TO SOURCE DESTRICT OF COMMANDERS OF PROPERTY OF PROPERTY OF PROPERTY OF THE PROPERTY
26		
27		
28		
20	STIPULATION	TO CONTINUE ADR DEADLINE TO JULY 5 2016

Mairin MacDonald

From:

Bossen, William < W.Bossen@MPGLAW.com>

Sent:

Monday, February 01, 2016 1:17 PM

To:

Jennifer Stewart; Melissa Grant (mlg@manningllp.com); Thomas, Cameron

Cc:

Mairin MacDonald; Alan Jang

Subject:

RE: CSAA v. Best Buy (Verducci)

LG will stipulate.

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From: Jennifer Stewart [mailto:jstewart@janglit.com]

Sent: Monday, February 01, 2016 12:46 PM

To: Melissa Grant (mlg@manningllp.com); Thomas, Cameron; Bossen, William

Cc: Mairin MacDonald; Alan Jang Subject: CSAA v. Best Buy (Verducci)

Dear Counsel:

Ivy from Judge Ryu's courtroom is now telling me that if the only reason I want to keep the 2/3/16 CMC on calendar is to continue the April ADR deadline, I should file a stipulation of all counsel re continuing the deadline instead, so as not to waste everyone's time. Fair enough. Will you both stipulate to continuing the April ADR deadline to July 15, 2016? I'll prepare the stip and circulate for filing today. If you'd prefer some other ADR deadline, please let me know asap.

Thanks!

Jennifer A. Stewart Associate Attorney JANG & ASSOCIATES, LLP 1766 Lacassie Ave. Suite 200 Walnut Creek, CA 94596

T: 925.937.1400 F: 925.937.1414

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1		PROOF OF SERVICE		
2	I, Mairin MacDonald, declare:			
3	I am employed in Contra Costa County, State of California, am over the age of eighteen			
4	years, and not a party to the within action. My business address is 1766 Lacassie Avenue, Suite 200, Walnut Creek, California 94596. I am readily familiar with the business practice for collection and processing of correspondence for mailing with the United States Postal Service and/or other overnight delivery. Under overnight delivery practice, all mailings are deposited in			
5				
7	an authorized	orized area for pick-up by an authoriz d and processed in the ordinary course of	zed express service courier the same day it is business.	
8		On this date, I served a true copy of the d	ocument described as:	
9	• 8	STIPULATION TO CONTINUE AD	R DEADLINE TO JULY 15, 2016	
10	on the parties in this action by placing a true copy thereof in a sealed envelope, and ea			
11	envelope	e addressed as follows:		
12	Melissa L. Grant, Esq. MUSICK, PEELER & G MANNING & CASS ELLROD, RAMIREZ, TRESTER, LLP Los Angeles, CA 90017 121 Spear Street, Suite 200		William A. Bossen, Esq. MUSICK, PEELER & GARRETT, LLP	
13			1 Wilshire Blvd., Suite 2000	
14			Los Aligeles, CA 9001/	
15	San Fr	rancisco, CA 94105		
16	✓	By U.S. Mail: I caused each such enve	elope to be served by depositing same, with	
17		postage thereon fully prepaid, in the Ur	nited States Postal Service in the ordinary	
18		course of business at Walnut Creek, Ca	alifornia.	
19		By CM/ECF Notice of Electronic Filing; Clerk of the Court by using the CM/ECF	I electronically filed the document(s) with the system. Participants in the case who are	
20	registered CM/EDF users will be served		by the CM/ECF system. Participants in the case	
21		who are not registered CM/ECF users wi permitted by the court rules.	in be served by mail or by other means	
22				
23	I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on February 1, 2016, at Walnut Creek, California.			
24		2010, at 17 aniat 010	Mari Mac Darlel	
25			Mairin MacDonald	
26				
27				

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