

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
 subrogee of Dennis and Mona Verducci

12 Plaintiffs,

13 vs.

14 LG ELECTRONICS U.S.A., Inc.; BEST
 15 BUY CO., INC. WHICH WILL DO
 BUSINESS IN CALIFORNIA AS MN
 16 BEST BUY CO., INC.; and DOES 1
 through 25, inclusive,

17 Defendants.
 18

CASE No.: 15-cv-02899-DMR
 HONORABLE DISTRICT JUDGE DONNA M. RYU
 COURTROOM 4

**STIPULATION TO CONTINUE ADR
 DEADLINE TO JULY 15, 2016 AND ORDER**

TRIAL DATE: 12/05/2016

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.

24 DATE: February 1, 2016

MUSICK, PEELER & GARRETT LLP

25 *(see attached email)*

26 William A. Bossen,
 27 Cameron W. Thomas
 Attorneys for Defendant LG Electronics USA
 28

STIPULATION TO CONTINUE ADR DEADLINE TO JULY 15, 2016

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

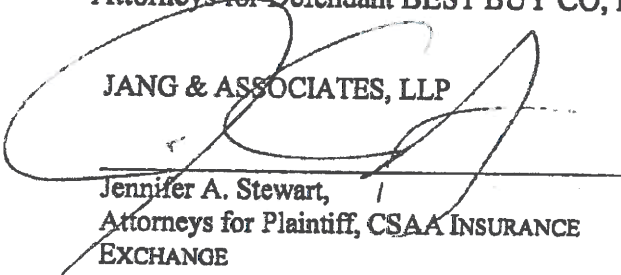
DATE: February 1, 2016

MANNING & KASS ELLROD, RAMIREZ,
TRESTER LLP


Melissa L. Grant
Attorneys for Defendant BEST BUY CO, INC.

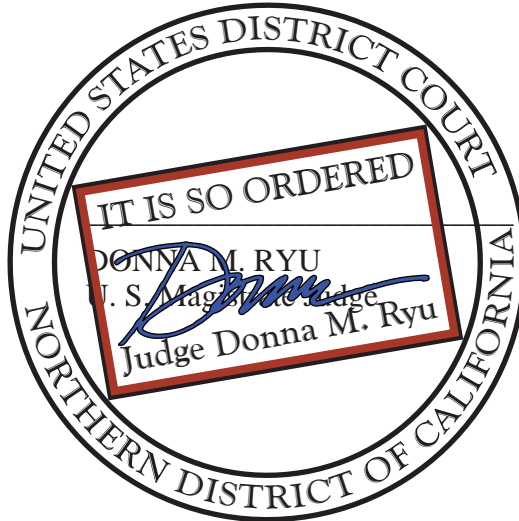
DATE: February 1, 2016

JANG & ASSOCIATES, LLP


Jennifer A. Stewart,
Attorneys for Plaintiff, CSAA INSURANCE
EXCHANGE

IT IS SO ORDERED.

Dated: February 2, 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.

The information contained in this communication is protected by the attorney-client and/or the attorney/work product privilege. It is intended only for the use of the addressee, and the privileges are not waived by virtue of this having been sent by e-mail. If the person actually receiving this communication or any other reader of the communication is not the named recipient, or the employee or agent responsible to deliver it to the recipient, any use, dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by return e-mail or by e-mail to administrator@mpglaw.com, and destroy this communication and all copies thereof, including all attachments.

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

Website: www.janglit.com

The information contained in this email may contain work product privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by email and delete the original message.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2

3
4
5
6
7

8

9

10
11

12
13
14
15

12
13
14

17

19
20
21

23

24

25