

1 DAVID T. WEI (230729)(dwei@ax-law.com)  
 MARCEL F. DE ARMAS (289282)(mdearmas@ax-law.com)  
 2 JAYSON S. SOHI (293176)(jsohi@ax-law.com)  
 AXCEL LAW PARTNERS LLP  
 3 4 Embarcadero Center, 14th Floor  
 San Francisco, CA 94111  
 4 Telephone 415-704-8800  
 Facsimile 415-704-8804  
 5 Email info@ax-law.com

6 Attorneys for Plaintiff DAVID R. SISKIN

7  
 8 UNITED STATES DISTRICT COURT  
 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 10

11 DAVID R. SISKIN,  
 12 Plaintiff,  
 13 v.  
 14 FOWNES BROTHERS & CO., INC.,  
 15 Defendant.

CASE NO.: 4:15-CV-02922-JSW

**NOTICE OF PENDING SETTLEMENT;  
 STIPULATED REQUEST TO CONTINUE  
 DEADLINES PENDING SETTLEMENT AND  
 [PROPOSED] ORDER**

16  
 17  
 18 Plaintiff David R. Siskin and Defendant Fownes Brothers & Co., Inc. respectfully submit  
 19 this Notice of Pending Settlement, Stipulated Request to Continue All Case Deadlines Pending  
 20 Settlement, and [Proposed] Order.

21 Pursuant to Civil L.R. 6-2(a)(1), the parties state the following:

- 22 1. The parties have reached a settlement-in-principal of all claims in this action.  
 23 2. The parties anticipate drafting a formal settlement agreement that will resolve this  
 24 matter entirely. The parties expect to submit a Joint Stipulation and Dismissal with Prejudice by  
 25 October 2nd, 2015.

26 3. Accordingly, the parties jointly and respectfully request that the Court stay all  
 27 remaining dates in this action as follows, to provide sufficient time to finalize a settlement  
 28 agreement:

Event	Presently Scheduled Date	Proposed Date
Last day for Defendant Fownes Brothers & Co, Inc. to respond to Plaintiff's Complaint	Sept. 21, 2015	Oct. 9, 2015
Last day for parties to file joint case management statement	Sept. 18, 2015	November 6, 2015 <del>Oct. 16, 2015</del>
Initial Case Management Conference	Sept. 25, 2015	November 13, 2015 <del>Oct. 23, 2015</del>

4. Pursuant to Civil L.R. 6-2(a)(2), the parties have not previously requested any extension of time.

5. Pursuant to Civil L.R. 6-2(a)(3), the requested time modification would delay the current case management conference schedule by 28 calendar days.

Respectfully submitted,

Dated: September 18, 2015

*/s/ David T. Wei*

David T. Wei (230729)  
AXCEL LAW PARTNERS LLP  
4 Embarcadero Center, Suite 1400  
San Francisco, CA 94111  
dwei@ax-law.com

*Attorneys for Plaintiff David R. Siskin*

Dated: September 18, 2015

*/s/ Robert W. Morris*

Robert W. Morris  
ECKERT SEAMANS CHERIN & MELLOTT, LLC  
10 Bank Street, Suite 700  
White Plains, NY 10606  
rwmorris@eckertseamans.com

*Attorneys for Defendant Fownes Brothers & Co., Inc.*

//

//

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. AS MODIFIED.

Date: September 21, 2015

  
\_\_\_\_\_  
JEFFREY S. WHITE  
UNITED STATES DISTRICT COURT JUDGE

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

Axcel Law Partners LLP  
4 Embarcadero Center, 14th Floor  
San Francisco, CA 94111  
415.704.8800