1 G. SCOTT EMBLIDGE, State Bar No. 121613 MATTHEW K. YAN, State Bar No. 257918 2 MOSCONE EMBLIDGE & OTIS LLP 220 Montgomery Street, Suite 2100 3 San Francisco, CA 94104 (415) 362-3599 Telephone: 4 (415) 362-2006 Facsimile: Email: emblidge@mosconelaw.com 5 yan@mosconelaw.com 6 Attorneys for Plaintiff 7 Deltaway Operations Services, LLC 8 9 UNITED STATES DISTRICT COURT 10 NORTHERN DISTRICT OF CALIFORNIA 11 SAN FRANCISCO COURTHOUSE 12 DELTAWAY OPERATIONS SERVICES. Case No. 4:15-cv-04473 YGR 13 LLC, a California limited liability company, Judge: Hon. Yvonne Gonzalez Rogers 14 Plaintiff, STIPULATION AND PROPOSED ORDER 15 **RE: CASE MANAGEMENT DEADLINES** VS. 16 *AS MODIFIED BY THE COURT* GLOBAL AMPERSAND, LLC, a Delaware limited liability company; AKEIDA 17 CAPITAL MANAGEMENT, LLC, a Delaware limited liability company; DAVID 18 KANDOHLA, an individual: and DOES 1-25. inclusive: 19 Defendants. 20 21 22 WHEREAS on December 22, 2015, the Court denied the Parties' request to extend case 23 management deadlines, but invited the Parties to submit a new request with dates calculated 24 based on a continuance to the case management conference of no more than thirty days; and 25 WHEREAS, the Parties have met and conferred and have selected dates that comport 26 with the schedules of both Parties, and will provide all Parties with sufficient time to review, 27 analyze, and respond to the allegations in Defendants' counterclaims and third-party claims, 28 prepare a diligent Rule 26 report, and participate meaningfully in a Rule 26 Conference; STIPULATION AND ORDER RE: CASE Case No.: 4:15-cv-04473 YGR 1 MANAGEMENT DEADLINES

1	THEREFORE, the Parties hereby agree and stipulate as follows:			
2	1. The Parties will meet and confer as required by Fed. R. Civ. P. 26(f)(1) no later			
3	than January 14, 2016;			
4	2.	2. The Parties will jointly submit a written report to the Court as required by Fed. R.		
5	Civ. P. 26(f)(2) no later January 21, 2016;			
6	3.	The current Rule 26 Conference scheduled for January 11, 2016, should be		
7	rescheduled to February 4, 2016;			
8	4.	The Parties will serve their	initial disclosures no later than February 18, 2016; and	
9	5.	Any response to Defendants	s' counterclaims and third-party claims will be filed	
10	with the Court and served on all Parties no later than February 25, 2016.			
11	SO STIPULATED.			
12				
13	Dated: Dece	Dated: December 23, 2015 MOSCONE EMBLIDGE & OTIS LLP		
14				
15			By: /s/ Matthew K. Yan Matthew K. Yan	
16			Attorneys for Plaintiff Deltaway	
17			Operations Services, LLC	
18	Dated: Dece	ember 23, 2015	COHEN TAUBER SPIEVACK & WAGNER PC	
19			By: /s/ Jay Spievack	
20			Jay Spievack	
21			Attorneys for Defendants Global Ampersand LLC, Akeida Capital Management LLC, and Devid Kandahla	
22			Management, LLC, and David Kandohla	
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1 **PROPOSED** ORDER 2 The Court has reviewed and considered the above stipulation and finds good cause to 3 issue the following order: 4 1. The Parties shall meet and confer as required by Fed. R. Civ. P. 26(f)(1) no later 5 than January 14, 2016; 6 2. The Parties shall jointly submit a written report to the Court as required by Fed. 7 R. Civ. P. 26(f)(2) no later January 21, 2016; 8 3. The current Rule 26 Conference scheduled for January 11, 2016, shall be 9 rescheduled to February 4, 2016 February 8, 2016 at 2:00 p.m.; 10 4. The Parties shall serve their initial disclosures no later than February 18, 2016; 11 and 12 5. Any response to Defendants' counterclaims and third-party claims shall be filed 13 with the Court and served on all Parties no later than February 25, 2016. 14 This Order terminates Docket Number 17. 15 IT IS SO ORDERED. 16 17 Dated: January 5, 2016 18 Hon. Yvonne Gonzalez Rogers 19 U.S. District Court Judge 20 21 22 23 24 25 26 27 28

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