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6 Attorneys for Plaintiff  
LESA, LLC

7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 OAKLAND DIVISION

12 **LESA, LLC**, a Delaware limited liability  
company,

13 Plaintiff;

14 v.

15 **FAMILY TRUST OF KIMBERLY AND ALFRED**  
16 **MANDEL**,  
17 **JAMES FISHER**, an individual,  
18 **CHRISTINE WILLIAMS**, an individual,  
19 **GREGORY ROSSMANN**, an individual,  
20 **ALFRED MANDEL** an individual,  
**ANDREW CHASE**, an individual,  
and the **ANDREW CHASE 2005 REVOCABLE**  
**TRUST UAD 3/29/05 AS AMENDED 5/10/20**,

21 Defendants.

Case No. 4:15-cv-05574-KAW

**STIPULATION AND [~~PROPOSED~~] ORDER  
ENLARGING TIME RE: HEARING ON  
DEFENDANTS' MOTION TO DISMISS AND  
PARTIAL SUMMARY JUDGMENT.**

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1                    **STIPULATION ENLARGING TIME RE: DEFENDANTS’ MOTION TO DISMISS**

2                    This Stipulation is entered into by Plaintiff LESA, LLC and Defendants Family Trust of  
3 Kimberly and Alfred Mandel, Alfred Mandel, James Fisher, Christine Williams, Gregory  
4 Rossmann, Andrew Chase, and Andrew Chase 2005 Revocable Trust UAD 3/29/2005 as  
5 Amended 5/10/20 (collectively, “Defendants”) by their respective counsel.

6                    **RECITALS**

7                    A.        Plaintiff LESA, LLC filed its Complaint on December 4, 2015 (Dkt. 1).

8                    B.        Defendants filed their Motion to Dismiss Second Cause of Action of Second  
9 Amended Complaint for Failure to State a Claim (FRCP12(b)(6)) and Defendant Rossmann,  
10 Mandel, Fisher and Williams’ Motion for Partial Summary Judgment on Third Cause of Action  
11 (FRCP 56) (the “Motion to Dismiss”) on May 31, 2016 (Dkt. 33), set for hearing on September  
12 1, 2016.

13                  C.        Plaintiff filed its Opposition to Defendants’ Motion on June 14, 2016 (Dkt. 49).

14                  D.        Counsel for Plaintiff will not be available on September 1, 2016 for the Hearing  
15 on Defendants’ Motion to Dismiss due to travel and other obligations.

16                  E.        Counsel for Defendants will not be available on September 15, 2016.

17                  F.        The Parties understand that the next available date for Law and Motion Hearing  
18 before the Honorable Kandis Westmore is November 3, 2016.

19                    **STIPULATION**

20                  To accommodate Counsel’s various scheduling conflicts, the Parties hereby stipulate to  
21 modify the briefing schedule for the Motion as follows:

22                  Hearing on Motion to Dismiss:                    Thursday, November 3, 2016

23 **IT IS SO STIPULATED.**

24 Dated: August 26, 2016

COMPUTERLAW GROUP LLP

26 By:                    /s/ Christopher Sargent  
27 Jack Russo  
Christopher Sargent

28 Attorneys for Plaintiff  
LESA, LLC



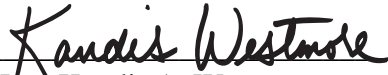
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**[PROPOSED] ORDER**

Pursuant to Parties' Stipulation, Defendants' Motion to Dismiss hearing date is moved from September 1, 2016 to November 3, 2016.

**SO ORDERED.**

Dated: 8/25, 2016

  
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Hon. Kandis A. Westmore  
United States Magistrate Judge