

1 CALVIN E. DAVIS (SBN: 101640)  
 cdavis@gordonrees.com  
 2 GORDON & REES LLP  
 633 West Fifth Street, 52nd Floor  
 3 Los Angeles, CA 90071  
 Telephone: (213) 576-5000  
 4 Facsimile: (213) 680-4470  
 5 Attorneys for Defendant  
 SYNERGY HOMECARE FRANCHISING, LLC  
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8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10

Gordon & Rees LLP  
 633 West Fifth Street, 52nd Floor  
 Los Angeles, CA 90071

|  |   |  |
|--|---|--|
| 11 John Han, an individual, Alice Lai-Bitker, an | ) | CASE NO. 4:16-cv-03759-KAW                   |
| individual, Veris Eastbay Homecare, Inc., a      | ) |  |
| 12 California corporation                        | ) | <b>STIPULATION AND <del>(PROPOSED)</del></b> |
|  | ) | <b>ORDER TO CONTINUE THE</b>                 |
| 13 Plaintiffs,                                   | ) | <b>INITIAL CASE MANAGEMENT</b>               |
|  | ) | <b>CONFERENCE AS MODIFIED</b>                |
| 14 vs.   | ) |  |
|  | ) |  |
| 15 Synergy Homecare Franchising, LLC, an Arizona | ) |  |
| limited liability company,                       | ) |  |
|  | ) |  |
| 16 Defendant.                                    | ) |  |
|  | ) |  |
| 17   | ) |  |

18  
 19 WHEREAS on January 13, 2017, plaintiffs John Han, Alice Lai-Bitker, and Veris  
 20 Eastbay Homecare, Inc. (collectively, "Plaintiffs") filed a Motion for Leave to Amend the  
 21 Complaint in the above-captioned matter;

22 WHEREAS Plaintiff's Motion for Leave to Amend the Complaint is currently scheduled  
 23 to be heard on March 2, 2017;

24 WHEREAS the initial Case Management Conference ("CMC") is scheduled to take place  
 25 on February 7, 2017;

26 WHEREAS the deadline for the parties to file their Rule 26(f) Report and Joint Case  
 27 Management Conference Statement is currently January 31, 2017;

28 ///

1 WHEREAS counsel for the parties have met and conferred and have agreed that  
2 economy and efficiency support continuing the CMC until after the Court decides the pending  
3 Motion to Amend the Complaint;

4 IT IS STIPULATED that (1) the parties' deadline to file their Rule 26(f) Report and Joint  
5 Case Management Conference Statement be continued to April 4, 2017 and (2) the CMC be  
6 continued to April 11, 2017, at 1:30 p.m.

7 Dated: January 27, 2017

GORDON & REES LLP

8  
9 By: /s/ Calvin E. Davis  
10 Calvin E. Davis  
11 Attorneys for Defendant  
SYNERGY HOMECARE  
FRANCHISING, LLC

12 Dated: January 27, 2017

MILESTONE LEGAL, P.C.

13  
14 By: /s/ Philip Milestone  
(as authorized on 1/27/17)  
15 Philip Milestone  
16 Attorneys for Plaintiffs JOHN  
17 HAN, ALICE LAI-BITKER,  
and VERIS EASTBAY  
HOMECARE, INC.

18  
19 PURSUANT TO STIPULATION, IT IS SO ORDERED: AS MODIFIED

20  
21 Dated: 1/31, 2017

  
United States Magistrate Judge