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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

LAILA LAWYER, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

HOMARY INTERNATIONAL LIMITED,

Defendant.

Civil Action No. 4:24-cv-04113-HSG

**STIPULATION AND ORDER RE
BRIEFING SCHEDULE (as
modified)**

Judge: Hon. Haywood S. Gilliam, Jr.

1 Pursuant to Federal Rules of Civil Procedure 6 and 12, and Civil Local Rule 6-1(a),
2 Plaintiff Laila Lawyer (“Plaintiff”) and Defendant Homary International Limited (“Defendant”
3 and together with Plaintiff, the “Parties”), hereby agree and stipulate that good cause exists to
4 request an order from the Court continuing certain deadlines related to Defendant’s pending
5 Motion to Dismiss.

6 **RECITALS**

7 WHEREAS, on April 2, 2024, Plaintiff filed the Complaint against Defendant in California
8 State Court;

9 WHEREAS, on May 29, 2024, service was effectuated on Defendant pursuant to § 415.30
10 of the California Code of Civil Procedure;

11 WHEREAS, on July 8, 2024, Defendant removed this action to this Court pursuant to the
12 Class Action Fairness Act, 28 U.S.C. § 1332(d) (ECF No. 1);

13 WHEREAS, on September 24, 2024, Defendant filed a Motion to Dismiss Plaintiff’s First
14 Amended Complaint (ECF No. 26);

15 WHEREAS, Plaintiff’s deadline to respond to Defendant’s motion to dismiss is currently
16 October 8, 2024 and Defendant’s deadline to file a reply in support of its motion to dismiss is
17 currently October 15, 2024;

18 WHEREAS, because of conflicting pre-existing litigation, family, and personal
19 commitments, the Parties require extensions to these deadlines;

20 WHEREAS, this stipulation will not affect any other court ordered date;

21 WHEREAS, there has been one prior time modification in this case (ECF No. 21) regarding
22 the First Amended Complaint; and

23 WHEREAS, no party will be prejudiced by this extension of time.

24 **NOW THEREFORE, THE FOLLOWING IS HEREBY STIPULATED** by and between
25 the Parties:

26 1) The deadline for Plaintiff to file an opposition to Defendant’s Motion to Dismiss, shall be
27 October 22, 2024;

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2) The deadline for Defendant’s reply in support of its Motion to Dismiss shall be November 12, 2024.

Dated: September 25, 2024

BLANK ROME LLP

By: /s/ Ping Zhang
Ana Tagvoryan
Erica R. Graves
Ping Zhang

Attorneys for Defendant

Dated: September 25, 2024

BURSOR & FISHER, P.A.

By: /s/ Neal J. Deckant
Neal J. Deckant (State Bar No. 322946)
Julian C. Diamond (*PHV* forthcoming)
Matthew A. Girardi (*PHV* forthcoming)

Attorneys for Plaintiff

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ATTESTATION RE ELECTRONIC SIGNATURES

I, Neal J. Deckant, attest pursuant to Civil Local Rule 5-1(i)(3) that all other signatories to this document, on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: September 25, 2024

By: /s/ Neal J. Deckant
Neal J. Deckant

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ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

The Parties will adhere to the following deadlines:

- 1) The deadline for Plaintiff to file her opposition to Defendant’s Motion to Dismiss shall be October 22, 2024;
- 2) The deadline for Defendant’s reply in support of its Motion to Dismiss shall be November 12, 2024;
- 3) The hearing for Defendant’s Motion to Dismiss shall be continued from October 31, 2024 to December 5, 2024 at 2:00 p.m. A case management conference will be held on December 5th along with the hearing on the motion to dismiss.

Dated: 9/26/2024


Haywood S. Gilliam, Jr.
United States District Court