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\*\*E-filed 2/8/08\*\*

7 Attorneys for Defendant  
 HEWLETT-PACKARD COMPANY

9 UNITED STATES DISTRICT COURT  
 10 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 11 SAN JOSE DIVISION

13 JACKIE BLENNIS and DAVID BRICKNER,  
 14 individually and on behalf of all others similarly  
 15 situated,

Plaintiffs,

v.

16 HEWLETT-PACKARD COMPANY, a  
 17 California Corporation; and DOES 1 through  
 18 250, inclusive,

Defendants.

CASE NO. C 07 00333-JF

**JOINT STIPULATION AND [PROPOSED]  
 ORDER CONTINUING DEADLINE TO  
 HOLD ADR SESSION; SUPPORTING  
 DECLARATIONS OF ALFREDO  
 TORRIJOS AND MICHAEL H. DORE**

[N.D. Cal. Local Rule 6-1(b) & 6-2]

1 **JOINT STIPULATION**

2 WHEREAS Plaintiffs Jackie Blennis and David Brickner ("Plaintiffs") commenced this  
3 action by filing a Complaint on January 17, 2007, and serving the Complaint on Defendant Hewlett-  
4 Packard Company ("Defendant") on May 1, 2007;

5 WHEREAS on August 20, 2007, the Court (Judge Ronald Whyte presiding) set the deadline  
6 for the parties to hold an ADR session at 180 days from the date of his August 20, 2007 order, that is,  
7 February 16, 2008;

8 WHEREAS on January 14, 2008, the Court granted the parties' stipulated request to continue  
9 the case management conference in this matter until March 14, 2008 at 10:30 a.m.; and

10 WHEREAS good cause exists for approving this Joint Stipulation in light of the procedural  
11 posture of this and related cases pending in this Court in which HP is a defendant.

12 ACCORDINGLY, pursuant to Local Rule 6-1(b), the parties, by and through their counsel of  
13 record, hereby stipulate to, and request the Court's approval of the following:

- 14 • The parties agree that the existing deadline for the parties to hold the ADR session shall  
15 be moved from February 16, 2008, to **May 16, 2008**.

16 **IT IS SO STIPULATED.**

17  
18 DATED: February 2, 2008

KABATECK BROWN KELLNER LLP  
BRIAN S. KABATECK  
RICHARD L. KELLNER  
ALFREDO TORRIJOS

19  
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21  
22 By 

Alfredo Torrijos

23 Attorneys for Plaintiffs JACKIE BLENNIS and DAVID  
24 BRICKNER

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DATED: February 6, 2008


GIBSON, DUNN & CRUTCHER LLP  
PETER SULLIVAN  
SAMUEL G. LIVERSIDGE  
MICHAEL H. DORE

By:   
Michael H. Dore

Attorneys for Defendant HEWLETT-PACKARD  
COMPANY

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: 2/7/08, 2008

  
The Hon. Jeremy Fogel  
United States District Judge

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1 **DECLARATION OF MICHAEL H. DORE**

2 I, Michael H. Dore, declare as follows:

3 1. I am an attorney admitted to practice law before all courts of the State of California  
4 and I intend to submit an application to become a member of the bar of this Court. I am an associate  
5 in the law firm of Gibson, Dunn & Crutcher LLP, and I am one of the attorneys responsible for the  
6 representation of Defendant Hewlett-Packard Company ("HP") in the action entitled *Jackie Blennis*  
7 *and David Brickner, et al. v. Hewlett-Packard Company, et al.* (N.D. Cal. Case No. C 07-00333-  
8 RMW). Pursuant to Local Rule 6-2(a), I submit this declaration in support of the parties' Joint  
9 Stipulation and [Proposed] Order Continuing Deadline to Hold ADR Session (the "Joint  
10 Stipulation"). Unless otherwise stated, the following facts are within my personal knowledge and, if  
11 called and sworn as a witness, I could and would testify competently thereto.

12 2. The Reasons for the Requested Enlargement or Shortening of Time (Local Rule 6-  
13 2(a)(1)). I believe that in light of the procedural posture of this case and related cases pending in this  
14 Court in which HP is a defendant, efficiency would best be served by extending the deadline for the  
15 parties to hold their ADR session.

16 3. Prior Time Modifications in this Case (Local Rule 6-2(a)(2)). The parties twice have  
17 requested that the date of the case management conference be continued while HP's motion to  
18 dismiss was pending. Those requests have been granted. The case management conference now is  
19 scheduled for March 14, 2008.

20 4. Effect of the Requested Time Modification on the Schedule for the Case (Local  
21 Rule 6-2(a)(3)). The requested extension of time to hold an ADR session would change the deadline  
22 from February 16, 2008 until May 16, 2008.

23 I declare under penalty of perjury that the foregoing is true and correct.

24 DATED: February 12, 2008

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27 MICHAEL H. DORE

28 100382052\_1.DOC

1 **DECLARATION OF ALFREDO TORRIJOS**

2 I, Alfredo Torrijos, declare as follows:

3 1. I am an attorney admitted to practice law before all courts of the State of California. I am  
4 an associate in the law firm of Kabateck Brown Kellner LLP, and I am one of the attorneys  
5 responsible for the representation of Plaintiffs Jackie Blennis and David Brickner ("Plaintiffs") in the  
6 action entitled *Jackie Blennis and David Brickner, et al. v. Hewlett-Packard Company, et al.* (N.D.  
7 Cal. Case No. C 07-00333-RMW). Pursuant to Local Rule 6-2(a), I submit this declaration in  
8 support of the parties' Joint Stipulation and [Proposed] Order Continuing Deadline to Hold ADR  
9 Session (the "Joint Stipulation"). Unless otherwise stated, the following facts are within my personal  
10 knowledge and, if called and sworn as a witness, I could and would testify competently thereto.

11 2. The Reasons for the Requested Enlargement or Shortening of Time (Local Rule 6-  
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14 parties to hold their ADR session.

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17 dismiss was pending. Those requests have been granted. The case management conference now is  
18 scheduled for March 14, 2008.

19 4. Effect of the Requested Time Modification on the Schedule for the Case (Local Rule 6-  
20 2(a)(3)). The requested extension of time to hold an ADR session would change the deadline from  
21 February 16, 2008 until May 16, 2008.

22 I declare under penalty of perjury that the foregoing is true and correct.

23 DATED: February 1, 2008

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26 ALFREDO TORRIJOS