1 2 3	ADAM WANG, Bar No. 201233 LAW OFFICES OF ADAM WANG 12 South First Street, Suite 708 San Jose, CA 95113 Telephone: (408) 292-1040 Facsimile: (408) 416-0248	STATES DISTRICT CO		
4	Attorneys for Plaintiffs			
5	Mark A. Hagopian, Esq., SBN 124819, mhagopian Sejal Thakkar, Esq., SBN 226778, sxt@mmker.co	@mmker.com m IT IS SO ORDERED		
6	MANNING & MARDER KASS, ELLROD, RAMIREZ LLP	S Mos Abre F		
7 8	One California Street, Suite 1100 San Francisco, CA 94111 Telephone: (415) 217-6990	ZO Judge James Ware		
9	Facsimile: (415) 217-6999			
10	Attorneys for Defendants	DISTRICT OF 1/22/2010		
11	UNITED STATES DISTRICT COURT			
12	NORTHERN DISTRICT OF CALIFORNIA			
13	SAN JOSE DIVISION			
14				
15	LEONARDO ESPINOZA, and SERGIO ROQUE, ,	Case No. C08-01522 JW		
16	Plaintiffs,	STIPULATION FOR ONE WEEK EXTENSION TO FILE JOINT		
17	VS.	PREOTRIAL CONFERENCE STATEMENT, PROPOSED JURY		
18	C & C SECURITY PATROL, INC.,	INSTRUCTIONS AND MOTIONS IN LIMINE & [PROPOSED] ORDER		
19	HERMENEGILDO COUGH, MARCEL LOEPZ, GILBERT MARTINEZ, and DOES 1-	Judge: Honorable James Ware		
20	10	Trial Date: March 10, 2010 Pre-Trial Conference: February 22, 2010		
21	Defendants			
22	The Parties submit the following stipulation seeking an extension to file Joint Pre-Trial			
23	Conference Statement, Proposed Jury Instructions, and Motions in Limine due to the special			
24	circumstances described below:			
25	1. The final pre-trial conference in this case is set on February 22, 2010.			
26	2. There are two Plaintiffs in this case. Plaintiff Leonardo Espinoza is currently			
27	incarnated in Oregon. Plaintiff Sergio Rogue is scheduled for a sentencing hearing for a felony			
28	charge on February 22, 2010 and it is yet unclear whether jail time will be imposed.			
	Espinoza, et. al. v. C&C Security Patrol., et al. STIPULATION FOR EXTENSION	Page 1		

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1	3. Given the circumstances, parties are making the last efforts to resolve this matter				
2	by way of settlement.				
3	4. Because of the incarceration of Plaintiff Espinoza, it is difficult to communicate				
4	settlement offers and obtain settlement authorities from Mr. Espinoza.				
5	5. Parties wish to have more time to work out a settlement before spending substantial				
6	amount of time in preparing for the pre-trial filings that are due on January 22, 2010.				
7	6.	As such, parties agree and stipulate	to seek one week extension to file	e Joint Pre-	
8	Trial Conference Statement, proposed jury instructions, and motions in limine until January 29,				
9	2010, and all other dates remain unchanged.				
10	Respe	ctfully submitted,			
11	Dated: Januar	ry 21, 2010			
12			By: <u>/s/ Adam Wang</u> Adam Wang		
13			Attorney for Plaintiffs		
14	Dated: January 21, 2010				
15			By: <u>/s/ Sejal T</u> hakkar		
16			Sejal Thakkar Attorney for Defendants		
17		TESDISTRICT	2		
18	-	TT IS SO ORDERED			
19		Level Judge Jones Water) ORDER		
20		USTRICI			
21	Pursuant to parties stipulation, good cause shown, IT IS HEREBY ORDERED that parties shall file their Joint Pre-trial Conference Statement, proposed jury instructions, and motions in				
22					
23		r than January 29, 2010. All other d		-	
24	TT IS	SO ORDERED. The Court will not e	intertain further requests for extens	s10n.	
25	Dated: Janua	ry <u>22</u> , 2010	By: James Ubse		
26			JAMES WARE US DISTRICT JUDGE		
27			000000000000000000000000000000000000000		
28					
I		al. v. C&C Security Patrol., et al. FOR EXTENSION		Page 2	

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