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25 Attorneys for Plaintiff May Moua

26 UNITED STATES DISTRICT COURT
 27 NORTHERN DISTRICT OF CALIFORNIA

28 **MAY MOUA, individually and on behalf of
 other former and current employees, and
 for the interest of the general public,**

Plaintiffs,

v.

**INTERNATIONAL BUSINESS
 MACHINES CORPORATION, a
 California Business Entity, form unknown,
 JOSEPH KOENIG, an Individual,
 VENKATASUBRAMANIAM IYER, an
 Individual, and DOES 1-199,**

Defendants.

Case No. C 10-01070 EJD

**STIPULATION AND ~~PROPOSED~~
 ORDER EXTENDING DEADLINE
 FOR PRELIMINARY PRETRIAL
 CONFERENCE AND PRELIMINARY
 PRETRIAL CONFERENCE
 STATEMENT**

1 All parties to this action, though their duly authorized undersigned counsel, stipulate and
2 request as follows:

3 WHEREAS, in 2013, Defendants filed various motions, including motions for summary
4 judgment as to Plaintiff's PAGA claim on behalf of 16 of the 25 individuals (including herself)
5 whom she sought to represent at that point (Docket Nos. 101-103, 109, 110, 122-124, 126-128,
6 130, 131, 133-135) and a Motion for Partial Summary Judgment as to Plaintiff's Claims in
7 Counts 7-15 (Docket No. 263);

8 WHEREAS, on August 30, 2013, the Court determined that the preliminary pretrial
9 conference scheduled for September 6, 2013 was premature and entered an order vacating the
10 conference and noting that it would be rescheduled in the order resolving Defendants' then
11 pending motions;

12 WHEREAS, the Court has now ruled on all of Defendants' motions, narrowing the issues
13 that remain in the case;

14 WHEREAS, in its Order addressing Defendants' Motion for Partial Summary Judgment
15 as to Plaintiff's Claims in Counts 7-15 (Docket No. 263), the Court set a preliminary pretrial
16 conference for May 2, 2019 at 10:00 a.m. and directed the parties to file a joint preliminary
17 pretrial conference statement no later than April 22, 2019;

18 WHEREAS, after the Court issued this Order, counsel for the parties conferred and
19 discussed their mutual desire to explore resolving the remaining claims through mediation;

20 WHEREAS, counsel for the parties agree that delaying the preliminary pretrial conference
21 by approximately 90 days and extending the deadline to file the joint preliminary pretrial
22 conference statement will provide the parties an opportunity to explore the possibility of resolving
23 the remaining claims through mediation;

24 WHEREAS, the parties have not received a time modification in this case since June 6,
25 2013 (Docket No. 185);

26 WHEREAS, the parties agree to this extension in good faith and not to unduly delay the
27 progress of this case;

28 WHEREAS, there is no current case schedule that will be affected by this extension.

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IT IS HEREBY STIPULATED by and between the parties, through their respective counsel:

- 1. The preliminary pretrial conference, currently scheduled for May 2, 2019 at 10:00 a.m. is adjourned until August 1, 2019 at 10:00 a.m.
- 2. The deadline for filing the joint preliminary pretrial conference statement shall be July 22, 2019.

IT IS SO STIPULATED.

I hereby attest that I have on file all holograph signatures for any signatures indicated by a “conformed” signature (/S/) within this e-filed document.

Dated: April 18, 2019


Dated: April 18, 2019

By: /s/ Matthew W. Lampe
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PURSUANT TO STIPULATION, IT IS SO ORDERED:

Date: April 19, 2019



EDWARD DAVILA
 UNITED STATES DISTRICT JUDGE