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6 Attorneys for Defendant
 7 AMERICAN TRAFFIC SOLUTIONS, LLC

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN JOSE DIVISION

11 JULIE TALBERT, individually and on behalf
 12 of all others similarly situated,

13 Plaintiff,

14 v.

15 CITY OF CAPITOLA, a political subdivision
 16 of the State of California; CAPITOLA POLICE
 17 DEPARTMENT; AMERICAN TRAFFIC
 SOLUTIONS, LLC, a Limited Liability
 Company, and DOES 1 through 50,
 INCLUSIVE,

18 Defendants.

Case No. 5:10-CV-03113 JW

**STIPULATION AND ORDER FOR
 EXTENSION OF CASE
 MANAGEMENT CONFERENCE AND
 ASSOCIATED INITIAL DISCLOSURE
 AND ADR DEADLINES**

21 On July 16, 2010, Defendant AMERICAN TRAFFIC SOLUTIONS, LLC, (“ATS”) filed
 22 a Notice of Removal of State Action.

23 On July 23, 2010, Defendants ATS, CITY OF CAPITOLA, and CAPITOLA POLICE
 24 DEPARTMENT filed a Motion to Dismiss for failure to state a claim on which relief can be
 25 granted, which is set for hearing on January 24, 2011; at 9:00 a.m., in Courtroom 8 of this Court.


26 On August 12, 2010, Plaintiff JULIE TALBERT filed a Motion to Remand Action to
 27 State Court, which has been set for hearing on December 13, 2010, at 9:00 a.m. in Courtroom 8 of
 28 this Court.

1 The Case Management Conference is set for October 18, at 10:00 a.m., in Courtroom 8 of
2 this Court.

3 Pursuant to Civil Local Rule 6-1(b) and as a result of the pending motions, the parties
4 through their respective counsel hereby stipulate to continue the Case Management Conference
5 previously set for October 18, 2010, at 10:00 a.m. and all associated initial disclosure, discovery
6 plan, and ADR deadlines, to a date after the January 24, 2011 hearing on the motion to dismiss.

7
8 DATED: September 14, 2010

LAW OFFICE OF DAVID Y. IMAI

9
10 By:  /s/ DAVID Y. IMAI
11 Attorney for Plaintiff JULIE TALBERT

12
13 DATED: September 14, 2010

ATCHISON, BARISONE, CONDOTTI &
KOVACEVICH

14
15 By: _____ /s/
16 S. ADAIR PATERNO
17 Attorneys for Defendants
18 CITY OF CAPITOLA and CAPITOLA
POLICE DEPARTMENT

19 DATED: September 14, 2010

20 STOEL RIVES LLP

21
22 By: _____ /s/
23 MICHAEL B. BROWN
24 Attorneys for Defendant
25 AMERICAN TRAFFIC SOLUTIONS,
26 LLC

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ORDER

Good Cause Appearing, IT IS ORDERED THAT:

The Case Management Conference set for October 18, 2010, is continued to
January 24, 2011, at 10:00 AM., in Courtroom 8, located at 280 South First Street, San
Jose, California.

DATED: September 16, 2010



JUDGE OF THE DISTRICT COURT