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18 **Attorney for Plaintiff**  
19 **VICTOR ORTIZ**

20 **UNITED STATES DISTRICT COURT**  
21 **IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA**

22 **VICTOR ORTIZ,**

23 **Plaintiff,**

24 **v.**

25 **LIN R. ROGERS ELECTRICAL**  
26 **CONTRACTORS, INC.**

27 **Defendant.**

28 **USDC Case No. CV11-04750**

**JOINT STIPULATION AND**  
**[PROPOSED] ORDER**

**STIPULATION EXTENDING DATES FOR CASE MANAGEMENT CONFERENCE**  
**AND HEARING ON PLAINTIFF'S MOTION TO DISMISS COUNTERCLAIMS**

Pursuant to Civil Local Rules 6-2(a) and 7-12, the parties to the above-styled action, by

1 and through their undersigned counsel, hereby stipulate as follows:

2 1.) Plaintiff's Motion to Dismiss Defendant's Counterclaims was filed on November  
3 29, 2011;

4 2.) The parties are currently scheduled to hold both a Case Management Conference  
5 and a Hearing on Plaintiff's Motion to Dismiss Counterclaims on March 8, 2012;

6 3.) The deadline for the parties' initial disclosures under Fed. Rules Civ. Proc. Section  
7 26 is currently March 1, 2012;

8 4.) Defendant and its counsel have agreed that counsel will withdraw and Defendant  
9 will obtain new counsel.

10 5.) The parties have stipulated to a four-week extension to the Case Management  
11 Conference and Hearing on Plaintiff's Motion to Dismiss Counterclaims, to allow Defendant  
12 adequate time to seek and obtain counsel, then bring counsel up to speed on the issues currently  
13 before the Court.

14 6.) The parties have stipulated to a four-week extension to the deadline for filing  
15 initial disclosures required under Fed. Rules Civ. Proc. Section 26, to allow Defendant adequate  
16 time to seek and obtain counsel, then bring counsel up to speed on the issues currently before the  
17 Court.

18 7.) The parties previously stipulated to extend the time for Defendant to respond to  
19 Plaintiff's Complaint from October 17, 2011 until November 7, 2011;

20 8.) The parties previously stipulated to extend the time for Defendant to answer or  
21 otherwise respond to Plaintiff's Motion to Dismiss Defendant's Counterclaims to December 27,  
22 2011.

23 9.) The parties previously stipulated to extend the time for Plaintiff's Reply to  
24 Defendant's Response to January 10, 2012.

25 10.) Pursuant to Civil Local Rule 6.1(b), no court order is required to effect this  
26 Stipulated Extension.

27 THEREFORE, the parties stipulate to the following:

28 1.) The parties' Case Management Conference and Hearing on Plaintiff's Motion to

Dismiss Counterclaims are extended to April 6, 2012.

2.) The deadline for the parties' initial disclosures due under Fed. Rules Civ. Proc. Section 26 is extended to March 29, 2012.

SO STIPULATED, this 22nd day of February 2011.

/s/ Jennifer M. Schermerhorn

Jennifer M. Schermerhorn  
FINE, BOGGS & PERKINS LLP

Attorney for Defendant  
LIN R. ROGERS ELECTRICAL CONTRACTORS,  
INC.

/s/ Michael Velarde

Michael Velarde  
Michael Tracy  
LAW OFFICES OF MICHAEL TRACY

Attorney for Plaintiff  
VICTOR ORTIZ

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED:

1.) The parties' Case Management Conference and Hearing on Plaintiff's Motion to Dismiss Counterclaims is hereby moved to ~~April 6, 2012~~. April 19, 2012, at 1:30 p.m.

2.) The deadline for the parties' initial disclosures under Fed. Rules Civ. Proc. Section 26 is extended accordingly.

February 29, 2012  
Date

Lucy H. Koh  
Honorable Lucy H. Koh  
Judge of United States District Court

