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14 Plaintiff In Pro Se

15 UNITED STATES DISTRICT COURT  
 16 NORTHERN DISTRICT OF CALIFORNIA  
 17 SAN JOSE DIVISION

18 DENIZ BOLBOL, and JOSEPH  
 19 CUVIELLO, INDIVIDUALLY,  
 20  
 21 Plaintiffs,

22 v.

23 FELD ENTERTAINMENT INC., (dba  
 24 RINGLING BROS. and BARNUM &  
 25 BAILEY CIRCUS), RINGLING BROS.  
 26 CIRCUS GENERAL MANAGER JAMES  
 27 DENNIS, RINGLING BROS. CIRCUS  
 28 OPERATIONS MANAGER MATTHEW  
 GILLET and DOES 1 through 10,  
 Defendants.

Case No. 5:11-cv-05539 PSG

**STIPULATION AND ~~[PROPOSED]~~  
 ORDER TO EXTEND TIME FOR  
 PLAINTIFFS TO FILE OPPOSITION  
 TO DEFENDANTS' MOTION TO  
 DISMISS**

1 Under Civil L.R. 6-2, the parties may file a stipulation, conforming to Civil L.R. 7-12,  
2 requesting an order changing time that would affect the date of an event or deadline already fixed  
3 by Court order. The stipulated request must be accompanied by a declaration that:

4 (1) Sets forth with particularity, the reasons for the requested enlargement of time;

5 (2) Discloses all previous time modifications in the case, whether by stipulation or  
6 Court order; and

7 (3) Describes the effect the requested time modification would have on the schedule  
8 for the case.

9 The Hearing in this matter is scheduled for February 14, 2012. Plaintiffs' Opposition to  
10 Defendants' Motion to Dismiss would ordinarily be due on January, 4 2012.

11 Counsel for Ms. Bolbol respectfully requests that the deadline for Plaintiffs' Opposition  
12 to Defendants' Motion to Dismiss be extended to January 18, 2012, that Defendant, Feld  
13 Entertainment, Inc., be provided with two weeks to file its Reply by February 1, 2012, and that  
14 the Hearing on February 14, 2012, be rescheduled for March 6, 2012 at 10:00 a.m., in order to  
15 provide the Court with adequate time to review the pleadings. Plaintiffs make this request  
16 because Defendant's Motion to Dismiss was filed on December 21, 2011, and the period during  
17 which Plaintiffs have to file their Opposition by January 4, 2012, falls over the December  
18 holidays and the New Year. Counsel for Ms. Bolbol is short-staffed during this period in  
19 observance of the December holidays and the New Year, and as a result, filing the Opposition by  
20 January 4, 2012 would be onerous, burdensome, and prejudicial to Plaintiffs, and an extension  
21 for the deadline for Plaintiffs' Opposition and Defendants' Reply, and an accompanying  
22 rescheduling of the Hearing, would not prejudice, burden, and/or harm Defendants or the Court.  
23 In addition, Ms. Bolbol's counsel is due in court on January 4, 2012, on other matters.

24 There have been no previous time modifications either by stipulation or Court order in  
25 this case.

26 In addition to the extension of time for the Opposition from January 4, 2012 to January  
27 18, 2012, and a rescheduling of the Hearing from February 14, 2012 to March 6, 2012, the  
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1 requested time modifications would change the date on which Defendant would file a Reply  
2 from January 11, 2012 to February 1, 2012.

3 Based on the foregoing, Plaintiffs and Defendant, Feld Entertainment, Inc., stipulate as  
4 follows:

5 Plaintiffs will file their Opposition by 11:59 p.m., Wednesday, January 18, 2012,  
6 Defendant will file its Reply by 11:59 p.m., Wednesday, February 1, 2012, and Plaintiffs  
7 respectfully request that the Hearing set for Tuesday, February 14, 2012 at 10:00 a.m. be  
8 rescheduled for Tuesday, March 6, 2012 at 10:00 a.m.

9 IT IS SO STIPULATED.

10 Dated: January 3, 2012

GONZALEZ & LEIGH, LLP

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By: /s/ G. Whitney Leigh  
G. Whitney Leigh  
Attorney for Plaintiff  
DENIZ BOLBOL

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16 Dated: January 3, 2012

By: /s/ Joseph P. CuvIELLO  
JOSEPH P. CUVIELLO  
In Pro Se

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21 Dated: January 3, 2012

McMANIS FAULKNER

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By: /s/ Marwa Elzankaly  
Marwa Elzankaly  
Attorney for Defendant  
FELD ENTERTAINMENT, INC., (dba  
Ringling Bros. and Barnum & Bailey  
Circus)

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

Dated: 1/4/2012

*Paul S. Grewal*  
Magistrate Judge Paul S. Grewal  
UNITED STATES ~~DISTRICT~~ JUDGE  
MAGISTRATE