

Robert J. Camp
rcamp@cochranfirm.com
 Admitted *Pro Hac Vice*
THE COCHRAN FIRM – BIRMINGHAM, LLC
 1929 3rd Avenue North, Suite 800
 Birmingham, AL 35203
 (205) 244-1115 – Phone
 (205) 244-1171 - Facsimile

Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION**

NELSON GONZALEZ VILLA,
Individually, and on behalf of Putative
Class Members,

Plaintiffs,

vs.

UNITED SITE SERVICES OF
CALIFORNIA, INC.,

Defendant.

Case No.: No. 5:12-cv-00318-LHK

**STIPULATION AND ~~PROPOSED~~ ORDER
 TO EXTEND TIME TO FILE
 PLAINTIFFS’ RULE 23 MOTION FOR
 CLASS CERTIFICATION**

Plaintiff, Nelson Gonzalez Villa, individually, and on behalf of putative class members (“Plaintiffs”), and Defendant, United Site Services of California, Inc. (“Defendant”), through their undersigned attorneys, stipulate and respectfully request that this Court approve an extension of time for Plaintiffs to file their Rule 23 Motion for Class Certification. As grounds for this extension, the parties state as follows:

1. On May 23, 2012 the Court entered its Minute Order and Case Management Order setting September 6, 2012 as the deadline for Plaintiffs’ Class Certification Motion; October 4, 2012 as the deadline for Defendant’s Opposition; and October 18, 2012 as the deadline for Plaintiffs’ Reply. The hearing on Class Certification Motion is November 8, 2012.

1 2. The parties will be taking depositions in this matter the weeks of August 20, 2012
2 and August 27, 2012 and mediation is scheduled for August 29, 2012. Deposition transcripts
3 will not be available for review until September 5, 2012, one day before the current deadline for
4 Plaintiffs to file their Class Certification Motion.

5 3. Counsel for Plaintiffs and Defendant have agreed to extend the current deadline
6 for Plaintiffs' Class Certification Motion to **September 13, 2012**, and extend the related
7 deadlines a like number of days: October 11, 2012 for Defendant's Opposition and October 25,
8 2012 for Plaintiffs' Reply.

9 4. The parties believe the requested extension will have no impact on the schedule
10 for this case given its early stages and would allow the hearing date to remain the same.

11 **WHEREFORE, PREMISES CONSIDERED**, the parties stipulate to extend the time to
12 file and serve Plaintiffs' Rule 23 Motion for Class Certification to September 13, 2012,
13 Defendant's Opposition to October 11, 2012 and Plaintiffs' Reply to October 25, 2012.

14 Dated: August 17, 2012

15 Respectfully submitted,

16 *Attorneys for Plaintiffs:*

17 **THE COCHRAN FIRM, LLC**

18 /s/ Robert J. Camp

19 **ROBERT J. CAMP**

20 rcamp@cochranfirm.com

21 Admitted *Pro Hac Vice*

22 1929 3rd Avenue North, Suite 800

23 Birmingham, AL 35203

(205) 244-1115 – Phone

(205) 244-1171 - Facsimile

24 **MITCHELL G. ALLEN**

25 mallen@theallenlawfirm.com

26 Admitted *Pro Hac Vice*

27 **JACOBY & MEYERS**

1929 3rd Avenue North, Suite 600

Birmingham, AL 35203

(800) 411-4529 – Phone

1 **FERNANDO CHAVEZ**
2 fchavez@chavez-deleon.com
3 California Bar No. 86902
4 **LAW OFFICES OF FERNANDO CHAVEZ**
5 1530 The Alameda, Suite 301
6 San Jose, CA 95126
7 (408) 971-3113 – Phone
8 (408) 971-0107 – Facsimile

6 *Attorneys for Defendant:*

BERLINER COHEN

7 /s/ Susan E. Bishop
8 **SUSAN E. BISHOP**
9 Susan.Bishop@berliner.com
10 10 Almaden Blvd., Eleventh Floor
11 San Jose, CA 95113
12 (408) 286-5800 – Phone
13 (408) 998-5388 – Facsimile

13 **ECF ATTESTATION**

14 I, Robert J. Camp, am the ECF user whose ID and password are being used to file the
15 foregoing on August 16, 2012. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that
16 Susan E. Bishop has concurred in this filing.
17

18
19 /s/ Robert J. Camp
20 **ROBERT J. CAMP**

21
22 **ORDER**

23 PURSUANT TO STIPULATION, IT IS SO ORDERED.

24 Dated: August 21, 2012

25 Lucy H. Koh
26 **UNITED STATES DISTRICT COURT**
27
28