1	SUSAN E. BISHOP, CA STATE BAR NO. 187253 BERLINER COHEN TEN ALMADEN BOULEVARD		
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3	ELEVENTH FLOOR SAN JOSE, CALIFORNIA 95113-2233 TELEPHONE: (408) 286-5800 FACSIMILE: (408) 998-5388 susan.bishop@berliner.com		
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5	ATTORNEYS FOR DEFENDANT		
6	UNITED SITE SERVICES OF CALIFORNIA, INC.		
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8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10	SAN JOSE DIVISION		
11	NELSON GONZALEZ VILLA, on behalf of himself and all others similarly situated,	CASE NO. CV 12-00318 LHK	
12	Plaintiffs,	STIPULATION AND PROPOSED ORDER TO EXTEND TIME TO RESPOND TO	
13	V.	MOTION FOR CONDITIONAL CERTIFICATION	
14	UNITED SITE SERVICES OF		
15	CALIFORNIA, INC.,		
16	Defendant.		
17			
18	STIPULATION AND [PROPOSED] ORDER		
19	Plaintiff Nelson Gonzalez Villa ("Plaintiff") and defendant United Site Services of		
20	California, Inc. ("Defendant") through their undersigned attorneys, stipulate and respectfully		
21	request that this Court approve an extension of time for Defendant to file an opposition to the		
22	motion for conditional certification filed on July 10, 2012. As grounds for this extension of time,		
23	the parties hereto state as follows:		
24	1. The hearing on the motion has been scheduled for November 8, 2012. Counsel		
25	for Defendant has only started its preliminary analysis of the potential class. Further, Defense		
26	counsel changed firms effective August 8, 2012, causing a slight delay. Plaintiff graciously		
27	granted an extension of time, until August 23, 2012, for defendant to submit its opposition.		
28	Plaintiff's reply brief would be filed by September 10, 2012.		
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	STIPULATION AND PROPOSED ORDER TO EXTEND TIME TO RESPOND TO MOTION FOR CONDITIONAL CERTIFICATION Dockets.Justia.com		

1	2. There have been no other time modifications in this case.		
2	3. The parties believe this time modification will have no impact on the schedule for		
3	this case given its early stage and given that the hearing date will remain the same.		
4	NOW, THEREFORE, based upon the foregoing, the parties, through their undersigned		
5	attorneys, stipulate to extend the time to file and serve an opposition to the motion for		
6	conditional class certification to August 23, 2012 and the reply to September 10, 2012.		
7	IT IS SO STIPULATED between the parties.		
8	Dated: August 17, 2012 BERLINER COHEN		
9 10	By: <u>/s/ Susan E. Bishop</u> Susan E. Bishop Attorneys for Defendant UNITED SITE		
11	SERVICES OF CALIFORNIA, INC.		
12			
13	Dated: August 17, 2012 LAW OFFICES OF MITCH ALLEN		
14	By: <u>/s/ Mitch Allen</u> Mitch Allen		
15	Attorneys for Plaintiff NELSON GONZALEZ VILLA		
16	ECF ATTESTATION		
17	I, Susan E. Bishop, am the ECF User whose ID and password are being used to file the		
18	following: STIPULATION AND PROPOSED ORDER TO EXTEND TIME TO RESPOND TO		
19	MOTION FOR CONDITIONAL CERTIFICATION. In compliance with Civil L.R. 5-1(i)(3), I		
20	hereby attest that Mitch Allen has concurred in this filing.		
21	Dated: August 20, 2012 BERLINER COHEN		
22	By: <u>/s/ Susan E. Bishop</u>		
23	Susan E. Bishop Attorneys for Defendant UNITED SITE		
24	SERVICES OF CALIFORNIA, INC.		
25	ORDER		
26	PURSUANT TO STIPULATION, IT IS SO ORDERED		
27 28	Dated: August 23, 2012 United States Fistrict Court		
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	STIPULATION AND PROPOSED ORDER TO EXTEND TIME TO RESPOND TO MOTION FOR CONDITIONAL CERTIFICATION		