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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

ALLEGRO CONSULTANTS, INC., A CALIFORNIA CORPORATION, Plaintiff, vs. WELLINGTON TECHNOLOGIES, INC., an Ohio Corporation, ED	Case No. 5:13-cv-02204 **STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE AND TO CHANGE MOTION HEARING DATE AND PROPOSED ORDER**

GRIGLAK, an individual, JOSPEH J. JASKO, an individual AND DOES 1-100, INCLUSIVE;

Defendants.

Now come Plaintiff Allegro Consultants, Inc. ("Allegro" or "Plaintiff") and Defendant Joseph J. Jasko ("Jasko") through their attorneys, and hereby stipulate to both continuing the Case Management Conference that is currently scheduled for November 6, 2014 at 1:30 pm, and moving up the Motion Hearing that is currently scheduled for March 26, 2015 at 9:00 am. If it is in the best interests of the court, Plaintiff and Jasko are agreeable to having both the Case Management Conference and the Motion Hearing on the same date.

Defendant Jasko currently has a 12(b)(6) Motion to Dismiss before the court. Plaintiff's Response to Jasko's 12(b)(6) Motion is due on November 6, 2014, and Jasko's Reply is due on November 13, 2014. Thus, it would be in the best interests of all parties, and the court, to delay the Case Management Conference until the briefing schedule is completed, and the 12(b)(6) Motion has been ruled upon.

Accordingly, Plaintiff and Defendant Jasko respectfully request that the Case Management Conference be continued, and the Motion Hearing date moved up, to a time convenient to the court in the next four to six weeks.

Dated: November 4, 2014

_/s/ Nathan Benjamin__ ___
Nathan Benjamin
Attorney for Defendant Joseph Jasko

Dated: November 4, 2014

/s/ Eric K. Grinnell
Eric K. Grinnell
Attorney for Defendant Joseph Jasko

Dated: November 4, 2014

/s/ Nick Heimlich
Nick Heimlich
Attorney for Plaintiff

[PROPOSED] ORDER

The Court hereby finds good cause and orders that the Case Management Conference be continued to _____, _____ at _____, and that the Motion Hearing date be changed to _____, _____ at _____.

IT IS SO ORDERED.

Dated: _____, 2014.

BETH LABSON FREEMAN
United States District Judge