

1 Bruce J. Wecker (SBN 078530)
 2 Christopher L. Lebsock (SBN 184546)
HAUSFELD LLP
 44 Montgomery St. Suite 3400
 San Francisco, CA 94104
 Tel: (415) 633 – 1908
 Fax: (415) 358 – 4980
 bwecker@hausfeldllp.com
 clebsock@hausfeldllp.com

6 ROBERT J. YORIO (SBN 93178)
CARR & FERREL LLP
 120 Constitution Drive
 Menlo Park, CA 94025
 Tel: (650) 812 – 3400
 Fax: (65) 812 – 3444

10 Attorneys for Plaintiff
 Dominion Assets LLC

Joseph R. Re (Bar No. 134479)
 Stephen C. Jensen (Bar No. 149894)
 Irfan A. Lateef (Bar No. 204004)
 Brian C. Claassen (Bar No. 253627)

**KNOBBE, MARTENS, OLSON
 & BEAR, LLP**

2040 Main Street
 Fourteenth Floor
 Irvine, CA 92614
 Phone: (949) 760-0404
 Facsimile: (949) 760-9502
 joseph.re@knobbe.com
 stephen.jensen@knobbe.com
 irfan.lateef@knobbe.com
 brian.claassen@knobbe.com

Attorneys for Defendants Masimo Corporation
 and Cercacor Laboratories, Inc.

13 IN THE UNITED STATES DISTRICT COURT
 14 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 15 SAN JOSE DIVISION

16 DOMINION ASSETS LLC, a Delaware
 17 limited liability company

19 Plaintiff,

20 vs.

21 MASIMO CORPORATION, a Delaware
 corporation, and CERCACOR
 22 LABORATORIES, INC., a Delaware
 corporation;

23 Defendants.

) Case No.: 5:14-cv-03002 BLF (MEJ)

) **JOINT STIPULATION AND**
) ~~PROPOSED~~ **ORDER TO RESCHEDULE**
) **THE CASE MANAGEMENT**
) **CONFERENCE TO AUGUST 13, 2015**

) Hearing: Case Management Conference

) Judge: Beth Labson Freeman

) Date: May 28, 2015

) Time: 1:30 pm

26 This Court’s has set a Case Management Conference for Thursday May 28, 2015 in an
 27 Order dated April 28, 2015. Pursuant to Judge Freeman’s Standing Case Management Order
 28 and Civil L.R. 16-2(e), the parties, Plaintiff Dominion Assets LLC (“Plaintiff”) and

1 Defendants Masimo Corporation and Cercacor Laboratories, Inc. (“Defendants”), through
2 their respective attorneys of record, hereby agree and stipulate to respectfully request this
3 Court to reschedule the Case Management Conference from May 28, 2015 to Thursday,
4 August 13, 2015. Further, the parties request that the deadline for their Case Management
5 Conference Statement be extended to seven days before the Case Management Conference to
6 Thursday, August 6, 2015.

7 The Parties have been cooperating regarding the Case Management Statement,
8 alternative dispute resolution, and identifying the issues remaining in the case.

9 Plaintiff’s primary counsel, undersigned, recently learned of a medical issue that
10 requires his attention beginning on the currently scheduled day for the Case Management
11 Conference.

12 Defendants do not oppose an extension of the schedule to accommodate Plaintiff’s
13 counsel’s schedule.

14 Pursuant to Civil L. R. 6-2 and 7-12, the Parties hereby stipulate and move the Court
15 for an Order extending the Case Management Conference to Thursday, August 13, 2015. The
16 Parties also respectfully request permission for relief from the Civil L.R. 6-1(b)’s requirement
17 that a request affecting the Court’s calendar be filed no later than 14 days before the
18 scheduled event in the present circumstance.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Respectfully submitted,
HAUSFELD LLP

Dated: May 19, 2015

By: /s/ Bruce J. Wecker
Bruce J. Wecker, Esq.
Christopher L. Lebsock, Esq.
HAUSFELD LLP
44 Montgomery Street
Suite 3400
San Francisco, CA 94104
Telephone: (415) 633-1908
Facsimile (415) 358-4980
bwecker@hausfeldllp.com
clebsock@hausfeldllp.com

Attorneys for Plaintiff Dominion Assets LLC

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: May 19, 2015

By: /s/ Irfan A. Lateef
Joseph R. Re
Stephen C. Jensen
Irfan A. Lateef
Brian C. Claassen
KNOBBE, MARTENS, OLSON & BEAR, LLP
2040 Main Street, Fourteenth Floor
Irvine, CA 92614
Telephone: (949) 760-0404
Facsimile: (949) 760-9502
joseph.re@kmob.com
stephen.jensen@kmob.com
irfan.lateef@kmob.com
brian.claassen@kmobb.com

Attorneys for Defendants, Masimo Corporation
and Cercacor Laboratories, Inc.

1 **ECF CERTIFICATION**

2 Pursuant to Civil Local Rule No. 5-1(i)(3), the filing attorney attests that he has
3 obtained concurrence from Irfan A. Lateef, Counsel for Defendants Masimo Corporation and
4 Cercacor Laboratories, Inc. regarding the filing of this Stipulation and [Proposed] Order to
5 Reschedule the Case Management Conference document from the signatories to the
6 document.

7
8 Dated: May 19, 2015

By: /s/ Bruce J. Wecker

9 Bruce J. Wecker, Esq.
10 Christopher L. Lebsock, Esq.
11 HAUSFELD LLP
12 44 Montgomery Street
13 Suite 3400
14 San Francisco, CA 94104
15 Telephone: (415) 633-1908
16 Facsimile (415) 358-4980
17 bwecker@hausfeldllp.com
18 clebsock@hausfeldllp.com

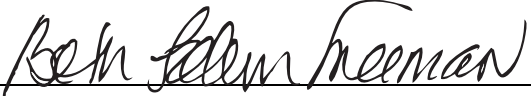
19 Attorneys for Plaintiff Dominion Assets LLC
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.

Dated: May 20, 2015

By: 
HON. BETH LABSON FREEMAN
UNITED STATES DISTRICT JUDGE