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6 Attorneys for Plaintiff
 7 DEREK BRANDON PICARD

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

11 DEREK BRANDON PICARD,

Case No. 5:14-CV-04618-RMW-HRL

12 Plaintiff,

**STIPULATION AND JOINT REQUEST TO
 CONTINUE CASE MANAGEMENT
 CONFERENCE AND || OR ER**

13 v.

14 ABC LEGAL SERVICES, INC., a
 15 Washington corporation, MARCOS
 16 ANTONIO TEJADA, individually and in his
 official capacity; and DOES 1 through 10,
 inclusive,

17 Defendants.

18 The parties in the above-entitled action hereby submit this Stipulation and Joint Request to
 19 Continue Case Management Conference regarding the Case Management Conference scheduled on
 20 March 13, 2015, at 10:30 a.m. In support of their request, the parties state as follows:

21 1. On December 10, 2014, the Court set the initial Case Management Conference in
 22 this matter for March 6, 2015.¹

23 2. The firm Consumer Law Center, Inc., counsel for record for Plaintiff, employs two
 24 attorneys – Fred W. Schwinn, and Raeon R. Roulston. Lead counsel, Mr. Schwinn, will be traveling
 25 out of the state on a previously-scheduled vacation from March 6, 2015, to March 20, 2015. Thus, his

26 ¹ Doc. 16.

1 associate, Mr. Roulston, was assigned to appear for Plaintiff at the initial Case Management Conference
2 in this matter, which was originally scheduled on March 6, 2015, at 10:30 a.m.

3 3. Thereafter, on February 20, 2015, the Court, of its own accord, continued the said
4 Case Management Conference to March 13, 2015.²

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6 4. Mr. Roulston is also scheduled to attend a Mediation on March 13, 2015, at 10:00
7 a.m., in the unrelated case of *Camacho v. Jefferson Capital*, CAND Case No. 5:14-CV-02728-BLF-
8 HRL. Thus, the Court's continuance of the initial Case Management Conference in this matter to
9 March 13, 2015, at 10:30 a.m., has created a calendar conflict for Plaintiff's counsel.

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11 5. Accordingly, the parties jointly request that the Court continue the Case
12 Management Conference currently set for March 13, 2015, at 10:30 a.m., to March 27, 2015, at 10:30
13 a.m. The parties further request that the deadline to file a Case Management Conference Statement be
14 continued from March 6, 2015, to March 20, 2015.

15 IT IS SO STIPULATED.

16 CONSUMER LAW CENTER, INC.

17
18 Dated: March 2, 2015

19 By: /s/ Raeon R. Roulston
20 Raeon R. Roulston, Esq.
21 Attorney for Plaintiff
22 DEREK BRANDON PICARD

23 WEISBERG & MILLER

24 Dated: March 2, 2015

25 By: /s/ Kenneth J. Sperandio, Jr.
26 Kenneth J. Sperandio, Jr., Esq.
27 Attorney for Defendant
28 ABC LEGAL SERVICES, INC.

² Doc. 22.

|| OR

Ronald M. Whyte

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