1 2 3 4 5 6	TOMAS E. MARGAIN, Bar No. 193555 HUY TRAN, Bar No. 288196 Justice at Work Law Group 84 West Santa Clara Street, Suite 790 San Jose, CA 95113 Telephone: (408) 317-1100 Facsimile: (408) 351-0105 Tomas@JAWLawGroup.com Huy@JAWLawGroup.com Attorneys for Plaintiffs ZENAIDA BOSE	
7	UNITED STA	TES DISTRICT COURT
8	NORTHERN DISTRICT OF CALIFORNIA	
9	SAN JOSE DIVISION	
10	SAN.	JOSE DIVISION
11	ZENAIDA BOSE and FLORENTINO	Case No. 14-CV-04744 NC
12	SABUG,	
13	Plaintiffs,	SECOND STIPULATION RE: SERVICE AND INITIAL CASE MANAGEMENT CONFERENCE AND ORDER
14	v.	
15	VIRGIL VALIN and AMOR VALIN, individually and together dba	
16 17	LASSENPARK RESIDENTIAL HALL and LASSENPARK VILLA, and SUNRISE RCFE, INC.,	
18	Defendants.	
19		
20		
21	TO THIS COURT AND ALL PARTIES THROUGH THEIR ATTORNEYS OF RECORD:	
22	The parties have stipulated to the following in regard to service of the initial pleadings and	
23	the initial case management conference:	
24	1. In the course of investigation, new parties were discovered. Plaintiff FLORENTINO	
25	SABUG joins Plaintiff ZENAIDA BOSE on all actions, and Defendant SUNRISE RCFE,	
26	INC. has been named. Defense Counsel ZANE BECKER will represent SUNRISE as	
27	well as Defendants VIRGIL and AMOR VALIN.	
28		
		1 Case No. 14-CV-04744 NC
	SECON	D STIPULATION

1	2. Defendant SUNRISE will waive service under FRCP 4, giving it 60 days from the date of
2	this stipulation to file an Answer. The parties agree that the deadline for Defendant
3	SUNRISE is Monday, May 25, 2015.
4	3. The parties have been negotiating a settlement in good faith, and have made progress. To
5	permit the parties more time to attempt informal resolution, the parties stipulate and
6	jointly request that the deadline for all Defendants to file their Answer be set for May 25,
7	2015. The parties also stipulate and jointly request that the Initial CMC currently set for
8	April 29 be continued until June 3.
9	IT IS SO STIPULATED
10	
11	Dated: March 25, 2015
12	//s//Huy Tran//s//
13	Huy Tran Attorney for Plaintiffs ZENAIDA BOSE and FLORENTINO
14 15	SABUG
15	
10	
18	Dated: March 25, 2015
19	//s//Zane Becker//s//
20	Zane Becker Attorney for Defendants
21	VIRGIL VALIN, AMOR VALIN and SUNRISE RCFE, INC.
22	TES DISTRICT
23	STAL CO
24	Dated: March 26, 2015
25	Dated: March 26, 2015
26	Materia
27	Z Judge Nathanael M. Cousins
28	
	Case No. 14-CV-04744 NC
	SECOND STIPULATION