

1 (Counsel of record on next page)

2

3

4

5

6

7

8

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

9

10

11 ERIC PADAYHAG,

CASE NO. 5:15-CV-04561 BLF

12 Plaintiff,

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE CASE
MANAGEMENT CONFERENCE**

13 vs.

14 FERGUSON ENTERPRISES, INC.; and
DOES 1 to 25,

15

Defendants.

16

17

18

19

20

21

22

23

24

25

26

27

28

JOINT STIPULATION & ORDER TO CONTINUE
CASE MANAGEMENT CONFERENCE
U.S.D.C., N.D. Cal., No. 5:15-cv-04561 BLF

1 JASON M. ERLICH (SB# 203661)
2 jason@mcelawfirm.com
3 MCCORMACK AND ERLICH, LLP
4 150 Post Street, Suite 742
5 San Francisco, CA 94108
6 Telephone: (415) 296-8420
7 Facsimile: (415) 296-85552

8 Attorney for Plaintiff
9 ERIC PADAYHAG

10 LESLIE L. ABBOTT (SB# 155597)
11 leslieabbott@paulhastings.com
12 PAUL HASTINGS LLP
13 515 South Flower Street
14 Twenty-Fifth Floor
15 Los Angeles, CA 90071-2228
16 Telephone: (213) 683-6000
17 Facsimile: (213) 627-0705

18 PAUL W. CANE, JR. (SB# 100458)
19 paulcane@paulhastings.com
20 ZINA DELDAR (SB# 282637)
21 zinadeldar@paulhastings.com
22 PAUL HASTINGS LLP
23 55 Second Street
24 Twenty-Fourth Floor
25 San Francisco, CA 94105-3441
26 Telephone: (415) 856-7000
27 Facsimile: (415) 856-7100

28 Attorneys for Defendant
FERGUSON ENTERPRISES, INC.

1 **JOINT STIPULATION**

2 Plaintiff Eric Padayhag and Defendant Ferguson Enterprises, Inc. ("Ferguson"), acting
3 through their respective counsel of record, hereby stipulate as follows:

4 1. The parties have scheduled a private mediation on January 28, 2016.

5 2. The Court has scheduled the Initial Case Management Conference for February 4,
6 2016, at 11:00 a.m., and the parties' Joint Case Management Statement is due on January 28, the
7 same day as the mediation. In addition, the Defendant's Motion to Compel Arbitration is
8 currently scheduled for hearing just two weeks later, on February 18, 2016 at 9:00 a.m.

9 3. In order to save the parties' and the Court's time and resources, Plaintiff and
10 Defendant respectfully request that the Initial Case Management Conference be continued to
11 February 18, 2016, at 9:00 a.m., or thereafter at the Court's convenience, with a Joint Case
12 Management Statement due one week before the rescheduled Initial Case Management
13 Conference.

14
15 DATED: January 19, 2016

McCORMACK AND ERLICH, LLP

16
17 By: /s/ Jason M. Erlich

Jason M. Erlich

18 Attorneys for Plaintiff
ERIC PADAYHAG

19
20 DATED: January 19, 2016

PAUL HASTINGS LLP

21 By: /s/ Zina Deldar

22 Zina Deldar

23 Attorneys for Defendant
FERGUSON ENTERPRISES, INC.

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

On the stipulation of the parties, and good cause appearing therefor,

IT IS ORDERED that the Initial Case Management Conference on February 4, 2016 at 11:00 a.m. in this action is continued to _____, 2016 at _____ [a.m./~~p.m.~~].

The Joint Case Management Statement is to be filed one week prior to the Initial Case Management Conference.

Dated: _____



Hon. Beth Labson Freeman
United States District Judge