1 2 3 4 5 6 7	ARNOLD & PORTER LLP Michael A. Berta (SBN 194650) michael.berta@aporter.com Carolyn A. Pearce (SBN 289681) carolyn.pearce@aporter.com Three Embarcadero Center, 10th Floor San Francisco, CA 94111-4024 Telephone: +1 415.471.3100 Facsimile: +1 415.471.3400 Attorneys for Defendant ADOBE SYSTEMS, IN	C.		
8	UNITED STATES DISTRICT COURT			
9	NORTHERN DISTRICT OF CALIFORNIA			
10	SAN JOSE DIVISION			
11	SARCIOL DIVISION			
12	DAVID HELLER,	Case No.:15-CV-4658-NC		
13	Plaintiff,	STIPULATION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE		
14	VS.	TO JANUARY 27, 2016 CERTAIN ASSOCIATE	D DEADLINES	
15	ADOBE SYSTEMS, INC.,	ACCORDINGLY; ORDER THEREON		
16	Defendant.	Judge: Hon. Natl	hanael Cousins	
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28		GEMENT CONFERENCE TO JAN D DEADLINES ACCORDINGLY CV-4658-NC	UARY 27, 2016 AND Dockets.Justia.com	

The parties stipulate, and ask the Court to enter an order, as follows:

1. The Initial Case Management Conference in the above-captioned matter is currently set for January 6, 2015.

Defendant Adobe Systems, Inc. has filed a motion to dismiss Plaintiff David Heller's Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6) ("Defendant's Motion") (Doc. #12). That motion is currently set to be heard on January 27, 2016.

3. Defendant believes that setting the initial Case Management Conference and the hearing on Defendant's Motion on the same day would be more convenient for the parties as well as promote judicial efficiency and economy. Plaintiff does not oppose Defendant's request.

4. Under the current schedule, the deadline for the initial Case Management Statement, Rule 26(f) Report, and initial disclosures is December 30, 2015.

5. Defendant Adobe's offices are closed for the holidays from December 23, 2015 through January 1, 2016, making it difficult for defense counsel to confer with the client regarding initial disclosures, Rule 26(f) Report, and the initial Case Management Statement currently due on December 30, 2015.

Defendant requests that the deadline for filing a Rule 26(f) Report, the initial Case
Management Statement, and initial disclosures be continued until January 20, 2016. Plaintiff does not oppose Defendant's request.

7. The parties have agreed to keep all other case schedule deadlines (the Rule 26(f) conference and ADR deadlines of December 16, 2015) the same.

8. This is the first continuance requested for the initial Case Management Conference and certain associated deadlines. This request is not being made for the purposes of delay.

9. It is therefore stipulated and agreed by Plaintiff and Defendant, through their respective attorneys of record, that the case management schedule be revised as follows:

STIPULATION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE TO JANUARY 27, 2016 AND ADJUST CERTAIN ASSOCIATED DEADLINES ACCORDINGLY Case No.: 15-CV-4658-NC

Event	Current Deadline	Requested Deadline	
Deadline for Rule 26(f) Report	December 30, 2015	January 20, 2016	
Deadline for Rule 26 Initial Disclosures	December 30, 2015	January 20, 2016	
Deadline for initial Case Management Statement	December 30, 2015	January 20, 2016	
Initial Case Management Conference	January 6, 2016	January 27, 2016, 1:00 p.m.	
IT IS SO STIPULATEI).	I	
Dated: December 15, 2015	ARNOLD & PORTER LLP By: <u>/s/ Carolyn A. Pearce</u> MICHAEL A. BERTA CAROLYN A. PEARCE Attorneys for Defendant ADOBE SYSTEMS, INC		
Dated: December 15, 2015		C /s/ Richard J. Mooney HARD J. MOONEY for Plaintiff DAVID HELLER	
	2	ONFERENCE TO JANUARY 27, 2016 AND	

ODDED		
<u>ORDER</u>		
Having reviewed the Stipulation of the parties, and good cause appearing:		
IT IS HEREBY ORDERED THAT the initial Case Management Conference in this action,		
currently set for January 6, 2016, be continued to January 26, 2016 at 1:00 p.m., and the deadline		
for the Rule 26(f) Report, Rule 26 initial disclosures, and initial Case Management Statement is		
continued to January 20, 2016.		
Date: December 16, 2015 THE HONERABLE NATHANAEL ACTIONS		
UNITED GRANTED		
~ Noter II		
Z Judge Nathanael M. Cousins		
DISTRICT OF CA		
DISTRICT		
3 STIPULATION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE TO JANUARY 27, 2016 AND		

4	ΑΤΤΕSΤΑΤΙΟΝ		
1	ATTESTATION		
2	I, Carolyn A. Pearce, am the ECF user whose User ID and Password are being used to file		
3	the STIPULATION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE TO		
4	JANUARY 27, 2016 AND ADJUST CERTAIN ASSOCIATED DEADLINES ACCORDINGLY.		
5	In compliance with Local Rule 5-1(i)(3), I hereby attest that Richard J. Mooney has concurred in		
6	this filing.		
7	Dated: December 15, 2015. By: /s/Carolyn A. Pearce		
8	CAROLYN A. PEARCE		
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	STIPULATION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE TO JANUARY 27, 2016 AND ADJUST CERTAIN ASSOCIATED DEADLINES ACCORDINGLY Case No.: 15-CV-4658-NC		