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14 *Attorneys for Plaintiff An Phan*
 [Additional Counsel Listed on Signature Page]

15 **UNITED STATES DISTRICT COURT**
 16 **NORTHERN DISTRICT OF CALIFORNIA**
 17 **SAN JOSE DIVISION**

18 AN PHAN, Individually and on Behalf of All
 Others Similarly Situated,

19 Plaintiff,

20 v.

21 GRAND BAHAMA CRUISE LINE, LLC, a
 limited-liability company; BAHAMAS
 22 PARADISE CRUISE LINE, LLC, a limited-
 liability company; CRUISE OPERATOR,
 23 INC., d/b/a BAHAMAS PARADISE CRUISE
 LINE, a corporation; and Does 1 through 50,
 24 inclusive,

25 Defendants.
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Case No. 15-cv-05019-BLF

STIPULATION AND ~~PROPOSED~~
ORDER TO SET BRIEFING SCHEDULE
FOR MOTION TO DISMISS AND TO
RESCHEDULE CASE MANAGEMENT
CONFERENCE

1 Plaintiffs An Phan and Taylor Bartlett (“Plaintiffs”), and Defendants Bahamas Paradise Cruise
2 Line, LLC and Cruise Operator, Inc. (“Defendants”),¹ hereby submit the following Stipulation and
3 [Proposed] Order to Set Briefing Schedule for Motion to Dismiss and to Reschedule Case
4 Management Conference:

5 WHEREAS Plaintiffs’ Opposition to Defendants’ Motion To Dismiss Or, In The Alternative,
6 Stay The Action (“Motion”) is currently due on January 11, 2016, and Defendants’ Reply is due on
7 January 19, 2016;

8 WHEREAS the Case Management Conference in this matter is currently scheduled for
9 January 28, 2016;

10 WHEREAS Plaintiffs’ counsel have multiple depositions and dispositive motions in other
11 cases either scheduled, or to be scheduled, for the month of January, 2016; and
12

13 WHEREAS the hearing on Defendants’ Motion to Dismiss is currently set for April 7, 2016;

14 NOW THEREFORE, in the interest of efficiency and judicial economy, it is hereby stipulated
15 and agreed, subject to the Court’s approval, that:
16

- 17 1. Plaintiffs’ Opposition to Defendants’ Motion shall be due on February 19, 2016;
- 18 2. Defendants’ Reply in support of its Motion shall be due on March 17, 2016; and
- 19 3. The Case Management Conference shall be vacated and rescheduled for April 7, 2016

20 or a date thereafter as determined by the Court.
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28 ¹ 1 Defendant Grand Bahama Cruise Line, LLC has not appeared in this action.

1 DATED: January 4, 2016

Respectfully submitted,

2 GLANCY PRONGAY & MURRAY LLP

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27 *Attorneys for Plaintiff An Phan*

28 Dated: January 4, 2016

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*Attorneys for Defendants Bahamas Paradise
Cruise Line, LLC and Cruise Operator, Inc.*

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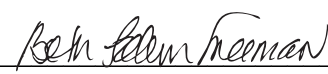
[PROPOSED] ORDER

Having reviewed the parties' Stipulation and [Proposed] Order to Set Briefing Schedule for Motion to Dismiss ("Motion") and to Reschedule Case Management Conference, and good cause appearing, IT IS HEREBY ORDERED THAT:

1. Plaintiffs' Opposition to Defendants' Motion shall be due on February 19, 2016;
2. Defendants' Reply in support of its Motion shall be due on March 17, 2016; and
3. The Case Management Conference shall be vacated and rescheduled for April 7, 2016

~~or a date thereafter as determined by the Court.~~

Dated: January 4, 2016



The Honorable Beth Labson Freeman
United States District Judge

1 **PROOF OF SERVICE VIA ELECTRONIC POSTING PURSUANT TO NORTHERN**
2 **DISTRICT OF CALIFORNIA LOCAL RULES AND LOCAL CIVIL RULE 5-1**

3 I, the undersigned, say:

4 I am a citizen of the United States and am employed in the office of a member of the Bar of
5 this Court. I am over the age of 18 and not a party to the within action. My business address is
1925 Century Park East, Suite 2100, Los Angeles, California 90067.

6 On January 4, 2016, I caused to be served the following document:

7 **STIPULATION AND [PROPOSED] ORDER TO SET BRIEFING SCHEDULE**
8 **FOR MOTION TO DISMISS AND TO RESCHEDULE CASE MANAGEMENT**
9 **CONFERENCE**

10 By posting the document to the ECF Website of the United States District Court for the
11 Northern District of California, for receipt electronically by the parties as reflected on the attached
Court’s Service List.

12 I certify under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct. Executed on January 4, 2016, at Los Angeles, California.

14
15 *s/ Mark S. Greenstone*
16 Mark S. Greenstone
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Mailing Information for a Case 5:15-cv-05019-BLF Phan v. Grand Bahama Cruise Line, LLC et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)