

1 LAW OFFICE OF J. CONOR CORCORAN, P.C.
2 J, CONOR CORCORAN, ESQUIRE
3 (PA Atty. Id. No. 8911 Admitted Pro Hac Vice)
4 conor@jccesq.com
5 1650 Market Street, Suite 3600
6 Philadelphia, PA 19103
7 Tel: (215) 735-1135
8 Fax: (215) 735-1175
9 Counsel for Plaintiff

6 JARED WEINSTOCK, ESQUIRE (SB# 252335)
7 jaredweinstock@gmail.com
8 4295 Bakman Avenue
9 North Hollywood, CA 91602
10 Phone: (310) 702-1224
11 Fax: (215) 735-1175

12 Attorneys for Plaintiff
13 SWEET CICELY DANIHER

11 UNITED STATES DISTRICT COURT
12
13 NORTHERN DISTRICT OF CALIFORNIA

14 SWEET CICELY DANIHER,
15
16 Plaintiff,

17 vs.

18 PIXAR ANIMATION STUDIOS; PIXAR
19 TALKING PICTURES; WALT DISNEY
20 MOTION PICTURES GROUP; and KORI
21 RAE

22 Defendants.

CASE NO. 5:22-cv-00372-BLF

**JOINT STIPULATION TO STAY
AND ORDER**

1 WHEREAS, the Court held a Case Management Conference on May 12, 2022;

2 WHEREAS, on May 17, 2022, the Court issued a Case Management Order (Dkt. No. 35),
3 ordering, among other things, that:

4 1. “The deadline for joinder of any additional parties, or other amendments to the
5 pleadings, is sixty days after entry of this order;”

6 2. “The deadline for the parties to meet, confer, and submit a stipulation and order
7 setting all deadlines not set by the Court below, including discovery cut-offs and
8 expert disclosure deadlines, May 27, 2022;” and

9 3. “Unless previously ordered or stipulated, the parties shall meet and confer further in
10 order to reach an agreement on an ADR process within 10 days of the date of this
11 Order. Within that same time frame, the parties shall either (1) file the form entitled
12 ‘Stipulation and (Proposed) order Selecting ADR Process’ if an agreement is
13 reached, or (2) file the form entitled ‘Notice of Need of ADR Phone Conference’.”
14

15
16 WHEREAS, the parties have discussed and are continuing to discuss (i) a potential
17 resolution to this case and (ii) a schedule for amended pleadings and motion practice if no resolution
18 is reached;

19 WHEREAS, in the interest of efficiency and judicial economy, the parties have agreed to
20 stay this case for thirty (30) days while pursuing the aforementioned resolution;

21
22 WHEREAS, by prior stipulations subsequently granted by the Court, the Parties (i)
23 extended Defendants’ deadline to answer or otherwise respond to Plaintiff’s Complaint by thirty
24 (30) days (Dkt. No. 17) and then, given Plaintiff’s Motion to Remand, to the date that is thirty (30)
25 days after the Court issues an order deciding that Motion (Dkt. No. 19), now set as June 9, 2022,
26 and (ii) set a briefing schedule for Plaintiff’s Motion to Remand (Dkt. No. 23);
27
28

1 WHEREAS, other than (i) Defendants' June 9, 2022 deadline to answer or otherwise
 2 respond to Plaintiff's Complaint and (ii) the deadlines set forth above from the Case Management
 3 Order, this stipulated stay will not affect the case schedule or alter the date of any event or deadline
 4 already fixed by Court order.

5
 6 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, pursuant to Local
 7 Civil Rule 6-2, by and between Plaintiff and Defendants, through their undersigned counsel, that
 8 the above-captioned lawsuit shall be stayed for thirty (30) days, through and including June 27,
 9 2022. All deadlines pending in the above-captioned lawsuit as of May 27, 2022 shall be extended
 10 for thirty (30) days.

11 DATED: May 27, 2022

13 PAUL HASTINGS LLP 14 15 By: <u>/s/ Josh B. Gordon</u> Josh B. Gordon 16 Attorneys for Defendants Pixar Animation 17 Studios, Pixar Talking Pictures, Walt Disney Motion Pictures Group, and Kori Rae	13 LAW OFFICE OF J. CONOR CORCORAN, P.C. 14 15 By: <u>/s/ J. Conor Corcoran</u> J. Conor Corcoran 16 Attorneys for Plaintiff Sweet Cicely 17 Daniher
---	--

18
 19 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

20
 21 Date: May 31, 2022

By: 

Hon. Beth Labson Freeman
U.S. District Judge

22
 23
 24
 25 **Filer's Attestation**

26 I, J. Conor Corcoran, am the ECF user whose identification and password are being used to
 27 file this **JOINT STIPULATION TO STAY**. In compliance with Civil Local Rule 5-1(h)(3), I
 28 hereby attest that the above-named signatories concur in this filing.