

Jane C. Mariani, SBN 313666
Law Office of Jane C. Mariani
584 Castro Street, #687
San Francisco, CA 94114
mariani.advocacy@gmail.com
(415) 533-8930

Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

HARRY J. BEIER, an individual; JOHN R. SCHOLZ, an individual; KEVIN E. BYBEE, an individual; and SALLY DILL, an individual;

on behalf of themselves and all others similarly situated

Plaintiffs,

vs.

INTERNATIONAL BROTHERHOOD OF TEAMSTERS, a labor organization; TEAMSTERS LOCAL 856, a labor organization; TEAMSTERS LOCAL 986, a labor organization; JAMES HOFFA, in his official capacity as International Brotherhood of Teamsters President and Representative; PETER FINN, in his official capacity as Teamsters Local 856 Principal Officer; UNITED AIRLINES, INC., a Delaware corporation; UNITED CONTINENTAL HOLDINGS, INC., a Delaware corporation;
Defendants.

Case No.: 18-cv-06632-JD

UNOPPOSED MOTION FOR RELIEF FROM CASE MANAGEMENT SCHEDULE REQUESTING 60-DAY EXTENSION OF TIME FOR THE INITIAL CASE MANAGEMENT CONFERENCE; PROPOSED ORDER

Hearing Date: May 9, 2019

Time: 10:00 a.m.

Place: Courtroom 11, 19TH Floor

Judge: Hon. James Donato

MOTION FOR RELIEF FROM CASE MANAGEMENT SCHEDULE

Pursuant to Civ. L. R. 16-2(d), Plaintiffs, by and through their attorney Jane C. Mariani, hereby move for relief from the Case Management Schedule, (Docket #41, February 26, 2019),

MOTION FOR RELIEF FROM CASE MANAGEMENT SCHEDULE -
CASE NO.: 3:18-CV-06632-JD

1 specifically providing for a Case Management Statement to be filed by May 2, 2019 and an
2 Initial Case Management Conference to be held on May 9, 2019 at 10:00 a.m. in San Francisco,
3 Courtroom 11, 19th Floor.

4
5 Good cause exists to extend the Case Management Schedule deadlines for 60-days.
6 Plaintiff Harry J. Beier has experienced a severe medical event, the extent and ramifications of
7 which will not be known for a minimum of 30-days. None of the events were within Plaintiff
8 Beier's control – Plaintiff Beier suffered multiple “strokes” over several days and is currently
9 admitted to Kaiser Permanente Hospital.

10
11 Plaintiff Beier is integral to the execution and presentation of Plaintiffs' case. In light
12 of his unexpected current medical status, additional time is necessary to allow Plaintiff Beier an
13 opportunity to continue to so contribute to this matter. And, additional time would give the
14 remaining Plaintiffs sufficient opportunity to prepare for and incorporate the developments of
15 Plaintiff Beier's recent health events in continuing to diligently pursue their case.

16
17 Plaintiffs' request is being made more than (14) days prior to the currently scheduled
18 deadlines, is made in good faith, and is not for the purpose of delay. The motion is unopposed
19 by the Defendants and Plaintiffs' counsel affirms to having conferred with Defendants' counsel
20 regarding this matter, securing their advance cooperation.

21
22 **Conclusion**

23 For these reasons, Plaintiffs respectfully ask the court to order a 60-day extension of all
24 dates listed in the current Case Management Schedule.

25 Dated: April 10, 2019

Respectfully submitted,

26 By: /s/ Jane C. Mariani
27 JANE C. MARIANI,
28 *Attorney for Plaintiffs*