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Co-Counsel Attorneys for Plaintiffs, American Airlines Flow-Thru
Pilots Coalition, Gregory R. Cordes, Dru Marquardt,
Doug Poulton, Stephan Robson and Philip Valente III

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

AMERICAN AIRLINES FLOW-
THRU PILOTS COALITION,
GREGORY R. CORDES, DRU
MARQUARDT, DOUG POULTON,
STEPHAN ROBSON and PHILIP
VALENTE III, on behalf of
themselves and all others similarly
situated

Plaintiff,

v.

ALLIED PILOTS ASSOCIATION
and AMERICAN AIRLINES, INC.
Defendants.

Case No.: 3:15-cv-03125 RS
[Assigned to Judge Richard Seeborg]

STIPULATION AND [PROPOSED]
ORDER SHORTENING TIME ON
PLAINTIFFS' MOTION FOR A
STAY AND FOR AN OSC RE
ADEQUACY OF CLASS COUNSEL

JOINT STIPULATION

COME NOW, Plaintiffs American Airlines Flow-Thru Pilots Coalition, Gregory R. Cordes, Dru Marquardt, Doug Poulton, Stephan Robson and Philip Valente III (collectively, “Plaintiffs”) and Defendant Allied Pilots Association (“Defendant”), and file this Joint Stipulation Shortening time on Plaintiff’s Motion for a Stay and for an Order to Show Cause re Adequacy of Class Counsel, and in support thereof show as follows:

WHEREAS, this Court granted class certification with respect to one of Plaintiffs’ claims pursuant to the Order dated June 16, 2016 (Docket No. 67); and Attorney Christopher W. Katzenbach thereby became Class Counsel for the certified class;

WHEREAS Plaintiffs have informed Defendant that Plaintiffs have been unable to substantively communicate with Class Counsel (Christopher Katzenbach, Esq.) since August-2018 and that they harbor grave doubts about Mr. Katzenbach’s present adequacy to serve as sole Class Counsel; and,

1 WHEREAS trial is currently set on April 29, 2019 pursuant to a Case
2 Management Conference that took place on August 2, 2018 (Docket No. 145);
3 and,
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6 WHEREAS Plaintiffs intend to Move this Court for (1) a stay of all
7 proceedings; (2) that an Order to Show Cause should issue regarding the
8 adequacy of Mr. Katzenbach to continue serving as sole Class Counsel; and
9 (3) for an order vacating all dates and deadlines in this action (the "Motion"); and
10 Defendant may wish to oppose the Motion,
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14 WHEREAS all parties wish to have the Motion heard and resolved as
15 quickly as possible; and,
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18 WHEREAS, good cause exists to shorten notice on the Plaintiff's Motion;
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21 IT IS HEREBY STIPULATED:
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24 Plaintiffs' Motion shall be filed not later than **February 4, 2019;**

25 Any Opposition shall be filed not later than **February 12, 2019;**

26 Plaintiff's Reply Brief be filed not later than **February 15, 2019;** and
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1 The hearing on Plaintiff's Motion shall be held on **February 21, 2019** at 1:30
2 p.m. in Courtroom 3.

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4 **AGREED.**

5 DATED: January 30, 2019
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7 TIMOTHY D. MCGONIGLE PROF. CORP.

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9 By: /s/ Timothy D. McGonigle
10 Timothy D. McGonigle

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12 BRAUNSTEIN & BRAUNSTEIN, P.C.

13 By: /s/ George Braunstein
14 George Braunstein

15 Attorneys for Plaintiffs, American Airlines Flow-Thru
16 Pilots Coalition, Gregory R. Cordes, Dru Marquardt,
17 Doug Poulton, Stephan Robson and Philip Valente III

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2 DATED: January 30, 2019 JAMES & HOFFMAN, P.C.
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4 By: /s/ Steven K. Hoffman
5 Steven K. Hoffman

6 DATED: January 30, 2019 ALTSHULER BERZON LLP
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8 By: /s/ Jeffrey B. Demain
9 Jeffrey B. Demain

10 Attorneys for Defendant Allied Pilots Association
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12 [PROPOSED] ORDER
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14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

15 Dated: _____ 2019
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18 _____
19 HON. RICHARD SEEBORG
20 UNITED STATES DISTRICT JUDGE
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