

Joanne Siegel et al v Warner Bros Entertainment Inc et al

Doc. 5

1 FROSS ZELNICK LEHRMAN & ZISSU, P.C.
Roger L. Zissu (Admitted *pro hac vice*)
2 James D. Weinberger (Admitted *pro hac vice*)
866 United Nations Plaza
3 New York, New York 10017
Telephone: 212-813-5900
4 Fax: 212-813-5901

5 PERKINS LAW OFFICE, P.C.
Patrick T. Perkins (Admitted *pro hac vice*)
6 1711 Route 9D
Cold Spring, NY 10516
7 Telephone: 845-265-2820
Fax: 845-265-2819

8 WEISSMANN WOLFF BERGMAN
9 COLEMAN GRODIN & EVALL LLP
Michael Bergman (SBN 37797)
10 Anjani Mandavia (SBN94092)
Adam Hagen (SBN 218021)
9665 Wilshire Boulevard, Ninth Floor
Beverly Hills, California 90212
11 Telephone: 310-858-7888
12 Fax: 310-550-7191

Priority
Send
Enter
Closed
JS-5/JS-6
JS-2/JS-3
Scan Only

Attorneys for Defendants and Counterclaimants

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

13
14
15
16
17
18 JOANNE SIEGEL and LAURA
SIEGEL LARSON,

19 Plaintiffs,

20 vs.

21 TIME WARNER INC., WARNER
COMMUNICATIONS INC., WARNER
22 BROS. ENTERTAINMENT INC.,
WARNER BROS. TELEVISION
23 PRODUCTION INC., DC COMICS,,
24 and DOES 1-10,

25 Defendants.

26
27 AND RELATED COUNTERCLAIMS
28

FILED
CLERK, U.S. DISTRICT COURT
AUG 30 2006
CENTRAL DISTRICT OF CALIFORNIA
DEPUTY
BY [Signature]

LODGED
CLERK, U.S. DISTRICT COURT
AUG 28 2006
CENTRAL DISTRICT OF CALIFORNIA
DEPUTY
BY [Signature]

Case Nos. [Consolidated for
Discovery]:

CV 04-8400 RSWL (RZx) ✓
04-8776 RSWL (RZx)

Hon. Ronald S.W. Lew, U.S.D.J.

Hon. Ralph Zarefsky, U.S.M.J.

STIPULATION AND
[PROPOSED] ORDER RE:
BRIEFING SCHEDULE FOR
MOTION FOR
RECONSIDERATION

DOCKETED ON CM
SEP - 1 2006
BY [Signature] 005
59

SCANNED

1 Defendants Time Warner Inc., Warner Communications Inc., Warner Bros.
2 Entertainment Inc., Warner Bros. Television Production Inc., and defendant and
3 counterclaimant DC Comics (collectively "Defendants") and plaintiffs Joanne
4 Siegel and Laura Siegel Larson (collectively "Plaintiffs"), by and through their
5 respective attorneys of record, hereby stipulate as follows:

6 WHEREAS on August 18, 2006 this Court entered its Order denying, in
7 substantial part, Defendants' motion to compel the production of further
8 documents by Plaintiffs (the "Order"), which Order was served on the parties on
9 August 22, 2006;

10 WHEREAS Defendants intend to bring a Motion for
11 Reconsideration of a portion of the Order, and advised Plaintiffs of that intention,
12 and the basis of their proposed Motion for Reconsideration, on August 22;

13 WHEREAS Local Rule 7-3 may be applicable and require Defendants to
14 wait 20 days from August 22 -- *i.e.*, until September 11, 2006 -- to file the Motion
15 for Reconsideration, necessitating a hearing date of October 2, 2006 or later;

16 WHEREAS Defendants have been advised that this Court is dark on
17 October 2 and on October 9, 2006, and the Court's next available hearing date is
18 October 16, 2006, approximately one month before the discovery cut-off date in
19 this matter;

20 WHEREAS the Court's ruling on the Motion for Reconsideration may
21 impact the extent of the testimony and the production of documents by key third
22 party witnesses, including a witness whose deposition is scheduled for September
23 28, 2006; and

24 WHEREAS the parties are agreeable to shortening the 20 day period of
25 Local Rule 7-3, so that Defendants' Motion for Reconsideration can be heard on
26 September 25, 2006.

27 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by
28 the parties, subject to the approval of the Court, that:

1 1. Defendants' Motion for Reconsideration shall be filed and served on
2 September 1, 2006, for hearing on September 25, 2006;

3 2. Plaintiffs' Opposition to the Motion for Reconsideration shall be
4 filed and served on September 13, 2006; and

5 3. Defendants' Reply in support of the Motion for Reconsideration
6 shall be filed and served on September 18, 2006.

7
8 Respectfully submitted,

9 DATED: August ~~28~~²⁸ 2006

FROSS ZELNICK LEHRMAN & ZISSU, P.C.
PERKINS LAW OFFICE, P.C.

11 -and-

12 WEISSMANN WOLFF BERGMAN
13 COLEMAN GRODIN & EVALL LLP

14 By: 
15 Michael Bergman

16 Attorneys for Defendants and Counterclaimant

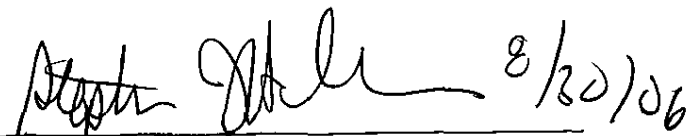
17 DATED: August ~~28~~²⁸, 2006

LAW OFFICES OF MARC TOBEROFF, PLC
18 Marc Toberoff
19 Nicholas C. Williamson

20 By: 
21 Nicholas C. Williamson

22 Attorneys for Plaintiffs/Counterclaim-Defendants

23 IT IS SO ORDERED:

24
25
26  8/30/06

27 RALPH ZAREFSKY
28 UNITED STATES MAGISTRATE JUDGE

PROOF OF SERVICE

SCANNED

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California; I am over the age of 18 and not a party to the within action; my business address is 9665 Wilshire Blvd, Ninth Floor, Beverly Hills, California 90212. On the date shown below, I served the documents described as: **STIPULATION AND [PROPOSED] ORDER RE: BRIEFING SCHEDULE FOR MOTION FOR RECONSIDERATION** on the interested parties in said action, by placing a true copy thereof enclosed in a sealed envelope, addressed as follows:

Marc Toberoff
Nicholas C. Williamson
Law Offices of Marc Toberoff, PLC
2049 Century Park East, Suite 2720
Los Angeles, CA 90067

XX **(BY MAIL)** I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Beverly Hills, California. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

___ **(FACSIMILE SERVICE)** I caused such document to be transmitted via facsimile to the offices of the addressees at the numbers listed above.

___ **(PERSONAL SERVICE)** I caused such envelope to be delivered by hand to the addressees above.

___ **(BY FEDERAL EXPRESS)** I caused a copy of such document(s) to be delivered to the offices of the addressee(s) via Federal Express, next business day delivery service.

Executed on **August 28, 2006**, at Beverly Hills, California.

___ **STATE** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

XX **FEDERAL** I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.


Alexandria Collier