

1 WHEREAS, the pre-trial conference in this matter is currently scheduled for January 8,
2 2015;

3 WHEREAS, counsel for Plaintiff, Ronald Moore (“Moore”), will be out of the country
4 on January 8, 2015 and unable to attend the pre-trial conference as currently scheduled;

5 WHEREAS, the Court has indicated its availability for January 15, 2015 at 8:30 a.m. for
6 the pre-trial conference; and

7 WHEREAS, Moore’s counsel’s office is in San Jose, California, and Defendant, Dollar
8 Tree Stores, Inc. (“Dollar Tree”)’s counsel’s office is in Costa Mesa, California – both a
9 significant distance from the Fresno courthouse. Accordingly, counsel for Moore and Dollar
10 Tree both request that they be able to appear at the pre-trial conference by telephone in order to
11 save the parties significant fees and costs.

12 NOW, THEREFORE, Moore and Dollar Tree, by and through their respective attorneys
13 of record, hereby stipulate and agree to continue the pre-trial conference from January 8, 2015
14 to January 15, 2015 at 8:30 a.m., subject to Court approval.

15 Counsel for Moore and Dollar Tree hereby further request that they be permitted to
16 appear telephonically at the pre-trial conference, such appearance to be arranged by Moore’s
17 counsel through AT&T teleconference services who will have trial counsel on the line prior to
18 conferencing in chambers at 8:30 a.m.

19 IT IS SO STIPULATED AND REQUESTED.

20
21 Date: December 3, 2014

MOORE LAW FIRM, P.C.

22 /s/ Tanya E. Moore

23 Tanya E. Moore
24 Attorneys for Plaintiff, Ronald Moore

25 SHEPPARD, MULLIN, RICHTER &
26 HAMPTON LLP

27 /s/ Gregory F. Hurley

28 Gregory F. Hurley
Attorneys for Defendant
Dollar Tree Stores, Inc. dba Dollar Tree

STIPULATION TO CONTINUE DATE OF PRE-TRIAL CONFERENCE; ORDER

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

The parties having so stipulated and good cause appearing,

IT IS HEREBY ORDERED that the pre-trial conference be continued from January 8, 2015 to January 15, 2015 at 8:30 a.m.

IT IS FURTHER ORDERED that all counsel may appear telephonically at the pre-trial conference, such appearances to be arranged by counsel for Plaintiff by ensuring both trial counsel are on the line prior to conferencing in chambers at the designated time.

IT IS SO ORDERED.

Dated: December 3, 2014

/s/ Lawrence J. O'Neill
UNITED STATES DISTRICT JUDGE