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7 8 9 10 11 12	GREGORY F. HURLEY, Cal. Bar No. 126791 ghurley@sheppardmullin.com MICHAEL J. CHILLEEN, Cal. Bar No. 210704 mchilleen@sheppardmullin.com 650 Town Center Drive, 4th Floor Costa Mesa, California 92626-1993		
13 14 15	Attorneys for Defendant DOLLAR TREE STORES, INC.		
16 17	UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA		
 18 19 20 21 22 23 24 25 26 27 28 	RONALD MOORE, Plaintiff, vs. DOLLAR TREE STORES, INC., dba DOLLAR TREE, Defendant.	No. 1:13-cv-01336-LJO-BAM STIPULATION TO CONTINUE DATE FOR PRE-TRIAL CONFERENCE AND REQUEST FOR TELEPHONIC APPEARANCES; ORDER	
28	STIPULATION TO CONTINUE DATE OF PRE-TRIAL CONFERENCE; ORDER Page 1		

1	WHEREAS, the pre-trial conference in this matter is currently scheduled for January 8,			
2	2015;			
3	WHEREAS, counsel for Plaintiff, Ronald	WHEREAS, counsel for Plaintiff, Ronald Moore ("Moore"), will be out of the country		
4	on January 8, 2015 and unable to attend the pre-tr	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 MOC	DRE LAW FIRM, P.C.		
22	2 / <u>/////////////////////////////////</u>	inya E. Moore		
23		a E. Moore neys for Plaintiff, Ronald Moore		
24				
25		PPARD, MULLIN, RICHTER & IPTON LLP		
26	5			
27		regory F. Hurley		
28	Attor	ory F. Hurley neys for Defendant		
	Dolla Dolla	r Tree Stores, Inc. dba Dollar Tree		
	STIPULATION TO CONTINUE DATE OF	PRE-TRIAL CONFERENCE; ORDER		
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1	ORDER	
2 3	The mention having as attended and and an end and and and a second start at the second	
4	The parties having so stipulated and good cause appearing, IT IS HEREBY ORDERED that the pre-trial conference be continued from January 8,	
5	2015 to January 15, 2015 at 8:30 a.m.	
6	IT IS FURTHER ORDERED that all counsel may appear telephonically at the pre-trial	
7	conference, such appearances to be arranged by counsel for Plaintiff by ensuring both trial	
8	counsel are on the line prior to conferencing in chambers at the designated time.	
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10	IT IS SO ORDERED.	
11	Dated: December 3, 2014 /s/ Lawrence J. O'Neill	
12	UNITED STATES DISTRICT JUDGE	
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	STIPULATION TO CONTINUE DATE OF PRE-TRIAL CONFERENCE; ORDER	
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