

1 JILL P. TELFER, (State Bar No. 145450)  
 LAW OFFICES OF JILL P. TELFER  
 2 A Professional Corporation  
 331 J Street, Suite 200  
 3 Sacramento, California 95814  
 Telephone: (916) 446-1916  
 4 Facsimile: (916) 446-1726  
 email: jilltelfer@yahoo.com

5 Attorney for Plaintiff  
 6 **MANJULA SINGH**

7  
 8 UNITED STATES DISTRICT COURT  
 9 EASTERN DISTRICT OF CALIFORNIA

11	MANJULA SINGH,	)	CASE NO.: 2:11-CV-01397-LKK-GGH
12		)	
13	Plaintiff,	)	
14	vs.	)	<b>STIPULATION TO CONTINUE THE</b>
15	FIVE STAR QUALITY CARE, INC.,	)	<b>PRETRIAL SCHEDULING</b>
16	Defendant.	)	<b>CONFERENCE; AND ORDER</b>

17  
 18 Plaintiff Manjula Singh (herein after "Plaintiff") along with Five Star Quality Care, Inc.,  
 19 (hereinafter "Defendant") through counsel request a continuance of the Pretrial Scheduling  
 20 Conference.

21 **GOOD CAUSE EXISTS FOR THIS CONTINUANCE**

22 In particular, Plaintiff's counsel will be out of state on a prescheduled trip the date of the  
 23 Pretrial Scheduling Conference.

24 ///  
 25 ///  
 26 ///  
 27 ///  
 28 ///

1           **IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES HERETO, BY**  
2 **AND THROUGH THEIR ATTORNEYS OF RECORD HEREIN, AS FOLLOWS:**

- 3           1.       The Pretrial Scheduling Conference in this matter be moved from **August 22, 2011;**  
4           2.       Plaintiff's counsel is unavailable on **August 22, 2011 until 3:00 p.m.** and **September**  
5                 **15, 2011;**  
6           2.       Defense counsel is unavailable on the following dates: **August 24, 2011; September**  
7                 **12, 2011 through September 23, 2011.**

8  
9 DATED: May 31, 2011

LAW OFFICES OF JILL P. TELFER  
*A Professional Corporation*

/s/

12 \_\_\_\_\_  
JILL P. TELFER  
Attorney for Plaintiff  
MANJULA SINGH

14 DATED:

JACKSON, LEWIS

/s/

17 \_\_\_\_\_  
JAMES JONES  
Attorney for Defendant  
FIVE STAR QUALITY CARE, INC.

18 **IT IS HEREBY ORDERED:**

- 19           1.       The Pretrial Scheduling Conference in this matter be moved from **August 22, 2011 at**  
20                 **1:30 to September 26, 2011 at 1:30 p.m.**  
21           2.       Counsel shall file their status reports fourteen (14) days prior to the new status  
22                 conference date.

23 Dated: July 20, 2011.

24  
25   
26 \_\_\_\_\_  
LAWRENCE K. KARLTON  
27 SENIOR JUDGE  
28 UNITED STATES DISTRICT COURT

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

**PROOF OF SERVICE**

CASE NAME: **SINGH v. FIVE STAR**  
CASE NO.: **2:11-cv-01397-LKK-GGH**

I declare that I am a citizen of the United States, that I have attained the age of majority, and that I am not a party to this action. My business address is 331 J Street, Sacramento, California 95814. I am familiar with this firm's practice of collection and processing of correspondence to be deposited for delivery via the U.S. Postal Service as well as other methods used for delivery of correspondence. On the below stated date, in the manner indicated, I caused the within document(s) entitled:

**STIPULATION TO CONTINUE TO PRETRIAL SCHEDULING CONFERENCE; AND PROPOSED ORDER**

to be served on the party(ies) or their (its) attorney(s) of record in this action:

- Via Mail: I caused each envelope (with postage affixed thereto) to be placed in the U.S. mail at Sacramento, California.
- via electronic mail by the United States District Court - Live System.
- Via **CERTIFIED** Mail: I caused each envelope (with postage affixed thereto) to be placed in the U.S. mail at Sacramento, California.
- Via Personal Service: I instructed each document to be hand-delivered via **HAND DELIVERY** to the address listed below.
- Via Overnight Courier: I caused each envelope to be delivered via overnight mail by **FEDERAL EXPRESS**.
- Via **FACSIMILE**: I instructed such to be transmitted via facsimile to the office(s) list below.

addressed as follows:

**Mr. James Jones**  
**JACKSON, LEWIS, LLP**  
**801 K Street, Suite 2300**  
**Sacramento, CA 95814**

- State: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- Federal: I declare that I am employed in the office of a member of the bar of this court at whose direction service was made.

Executed on July 20, 2011, at Sacramento, California.

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

/s/

---

Heather Domenico