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9 **Attorneys for Plaintiff**  
10 **J & J Sports Productions, Inc.**

11 **UNITED STATES DISTRICT COURT**  
12 **EASTERN DISTRICT OF CALIFORNIA**  
13 **SACRAMENTO DIVISION**

14 **J & J SPORTS PRODUCTIONS, INC.,**

15 **Plaintiff,**

16 **v.**

17 **MANG PHENG THAO,**

18 **Defendant.**

19 **CASE NO. 2:14-cv-02669-WBS-AC**

20 **PLAINTIFF'S *EX PARTE***  
21 **APPLICATION FOR AN ORDER**  
22 **CONTINUING THE INITIAL**  
23 **SCHEDULING CONFERENCE; AND**  
24 **ORDER (*Proposed*)**

25 **TO THE HONORABLE WILLIAM B. SHUBB, THE DEFENDANT AND HIS**  
26 **ATTORNEY/S OF RECORD:**

27 Plaintiff J & J Sports Productions, Inc., hereby applies *ex parte* for an order continuing the  
28 Initial Scheduling Conference presently set for Monday, March 16, 2015 at 2:00 PM. As set forth  
below Plaintiff respectfully requests that the Court continue the Initial Scheduling Conference to a new  
date approximately Thirty (30) to Forty-Five (45) days forward.

The request for the brief continuance is necessitated by the fact that Plaintiff has not yet  
perfected service of the initiating suit papers upon the Defendant Mang Pheng Thao, individually  
and d/b/a Sunrise 2 Sunset Grill. As a result, Plaintiff's counsel has not conferred with the defendant  
concerning the claims, discovery, settlement, ADR or any of the other pertinent issues involving the  
case itself or the preparation of a Joint Status Report.

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In addition, Thomas P. Riley, Plaintiff's counsel in this action, has calendaring conflicts on  
Monday, March 16, 2015 as Mr. Riley is scheduled to appear before the Honorable David R.

1 Strawbridge of the U.S.D.C. for the Eastern District of Pennsylvania, Philadelphia Division in the  
2 matter of *J & J Sports Productions, Inc. v. Baldino, et al.*; Case No. 2:14-cv-02444-AB for a Follow-  
3 Up Status Telephone Conference re: Settlement matter and Scheduling a Settlement Conference at 4:30  
4 P.M. (EDT) that very same day (ECF# 25); and a Initial Scheduling Conference before Honorable  
5 William B. Shubb of the U.S.D.C. for the Eastern District of California, Sacramento Division in the  
6 matter of *J & J Sports Productions, Inc. v. Hamad*; Case No. 2:14-cv-02728-WBS-DAD at 2:00 P.M.  
7 that very same day (ECF# 3) as well.

8 **WHEREFORE**, Plaintiff respectfully requests that this Honorable Court continue the Initial  
9 Scheduling Conference, presently scheduled for Monday, March 16, 2015 at 2:00 PM.

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12 Respectfully submitted,

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15 Dated: March 2, 2015

/s/ Thomas P. Riley

**LAW OFFICES OF THOMAS P. RILEY, P.C.**

By: Thomas P. Riley

Attorneys for Plaintiff

J & J Sports Productions, Inc.

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27 **ORDER**

1 It is hereby ordered that the Initial Scheduling Conference in civil action number 2:14-cv-02669-  
2 WBS-AC styled *J & J Sports Productions, Inc. v. Thao*, is hereby continued from 2:00 PM, Monday,  
3 March 16, 2015 to **April 27, 2015 at 2:00 p.m.** A Joint Status Report shall be filed no later than **April**  
4 **13, 2015**, and shall include a response by the defendant.


5 Plaintiff shall serve a copy of this Order on the Defendant and thereafter file a Certification of  
6 Service of this Order with the Clerk of the Court.

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**IT IS SO ORDERED:**

10 Dated: March 2, 2015

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WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE

23 **PROOF OF SERVICE (SERVICE BY MAIL)**

24 I declare that:

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26 I am employed in the County of Los Angeles, California. I am over the age of eighteen years  
27 and not a party to the within cause; my business address is 1114 Fremont Avenue, South Pasadena,  
28 California. I am readily familiar with this law firm's practice for collection and processing of  
correspondence/documents for mail in the ordinary course of business.

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On March 2, 2015, I caused to serve the following documents entitled:

**PLAINTIFF'S *EX PARTE* APPLICATION FOR AN ORDER CONTINUING THE INITIAL SCHEDULING CONFERENCE; AND ORDER (Proposed)**

On all parties in said cause by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was addressed to:

Mang Pheng Thao (Defendant)  
10113 Folsom Boulevard, Suites C-D  
Rancho Cordova, CA 95670

The fully sealed envelope with pre-paid postage was thereafter placed in our law firm's outbound mail receptacle in order that this particular piece of mail could be taken to the United States Post Office in South Pasadena, California later this day by myself (or by another administrative assistant duly employed by our law firm).

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct, and that this declaration was executed on March 2, 2015, at South Pasadena, California.

Dated: March 2, 2015

/s/ Vanessa Morales  
**VANESSA MORALES**