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6 BRAND MANAGEMENT, INC., L. BRANDS STORE DESIGN AND  
CONSTRUCTION, INC., L. BRANDS DIRECT FULFILLMENT, INC., L.  
7 BRANDS, INC.

8 U.S. DISTRICT COURT, EASTERN DISTRICT OF CALIFORNIA  
9 (SACRAMENTO DIVISON)

10 BARBARA BOGGS,  
11 Plaintiff,

12 v.

13 VICTORIA'S SECRET, VICTORIA'S  
14 SECRET STORES BRAND  
MANAGEMENT, INC., L. BRANDS  
15 STORE DESIGN AND  
CONSTRUCTION, INC., L. BRANDS  
16 DIRECT FULFILLMENT, INC., L.  
BRANDS, INC., and DOES 1 to 50,  
17 inclusive

18 Defendants.

CASE NO.: 2:15-CV-01920- KJM-KJN

**STIPULATION AND ORDER TO  
CONTINUE EARLY SETTLEMENT  
CONFERENCE**

Date: February 17, 2016  
Time: 9:00 a.m.  
Courtroom: 25, 8th Floor

Judge: Hon. Kimberly J. Mueller  
Settlement Judge: Hon. Kendall J.  
Newman

Complaint Filed: July 24, 2015  
Trial Date: April 17, 2017

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20 **STIPULATION**

21 Plaintiff Barbara Boggs ("Plaintiff") and Defendants (with Plaintiff, the  
22 "Parties") jointly submit their request to continue the Early Settlement Conference,  
23 currently set for February 17, 2016, and which was only scheduled as of February 5,  
24 2016, for good cause as set forth below:

- 25 1. This action is a personal injury action arising out a trip and fall wherein  
26 Plaintiff is alleging significant injury and monetary damages;  
27 2. At the time that this request is submitted, the Parties have not exchanged  
28 Initial Disclosures, so the Parties are without the benefit of having

1 received and reviewed information pertinent to their respective claims  
2 and defenses;

3 3. Defendants have also not yet ascertained Plaintiff's prior medical history  
4 and, as a result, have not yet been able to determine whether any of the  
5 injuries Plaintiff claims arising out of this incident were pre-existing or  
6 whether Plaintiff has received treatment prior to the incident for injuries  
7 that she may now attribute to this incident;

8 4. Given the current date of the Early Settlement Conference, the Parties  
9 agree that they have insufficient time to adequately prepare for the  
10 Settlement Conference and to make it productive and geared toward  
11 possible resolution;

12 5. The Parties did not anticipate that at the Initial Status Conference held  
13 on January 21, 2016, that the date of the Settlement Conference would  
14 essentially preclude the Parties from being able to preliminarily  
15 investigate the others respective claims, injuries and defenses; and

16 6. Defendant's counsel contacted Judge Newman's courtroom and  
17 obtained an alternative date of May 6, 2016 to hold the Settlement  
18 Conference that is convenient to Judge Newman.

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In light of the foregoing, IT IS HEREBY STIPULATED by and between the Parties, by and through their respective counsel that the Settlement Conference currently set for February 17, 2016 should be continued to May 6, 2016.

Dated: February 11, 2016

SMITH DOLLAR PC

/s/ Richard R. Sutherland

By \_\_\_\_\_  
Richard R. Sutherland  
Attorney for Defendants

Dated: February 11, 2016

QUINN & KRONLUND, LLP

By \_\_\_\_\_  
Michael C. Kronlund  
Attorney for Plaintiff Barbara Boggs



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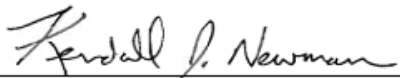
**ORDER**

Having reviewed the Stipulation submitted by the Parties, and good cause appearing, the Court hereby GRANTS the request to continue the Early Settlement Conference.

The Settlement Conference currently set for February 17, 2016, is hereby vacated and continued to May 6, 2016, at 9:00 a.m., in Courtroom 25, 8th Floor, before Magistrate Judge Kendall J. Newman.

SO ORDERED.

Dated: February 11, 2016

  
KENDALL J. NEWMAN  
UNITED STATES MAGISTRATE JUDGE



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