

1 CALDWELL LESLIE & PROCTOR, PC  
 2 CHRISTOPHER G. CALDWELL, SBN 106790  
 3 caldwell@caldwell-leslie.com  
 4 LINDA M. BURROW, SBN 194668  
 5 burrow@caldwell-leslie.com  
 6 MICHAEL D. ROTH, SBN 217464  
 7 roth@caldwell-leslie.com  
 8 1000 Wilshire Blvd., Suite 600  
 9 Los Angeles, California 90017-2463  
 10 (213) 629-9040  
 11 (213) 629-9022 fax

12 Attorneys for Defendant  
 13 CBS RADIO INC.

14 FREEDMAN & TAITELMAN, LLP  
 15 BRYAN J. FREEDMAN, SBN 151990  
 16 bfreedman@ftllp.com  
 17 MICHAEL A. TAITELMAN, SBN 156254  
 18 mtaitelman@ftllp.com  
 19 1901 Avenue of the Stars, Suite 600  
 20 Los Angeles, California 90067-6001  
 21 (310) 201-0005  
 22 (310) 201-0045 fax

23 Attorneys for Plaintiffs  
 24 STAN LACKEY, aka. JOHN LONDON, and  
 25 JOHN LONDON LTD

16 **UNITED STATES DISTRICT COURT**  
 17 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
 18

19 STAN LACKEY, aka. JOHN  
 20 LONDON, JOHN LONDON, LTD.,  
 21 DENNIS CRUZ, CHRIS TOWNSEND,

Case No. C 06-03987 MHP

22 Plaintiffs,

**STIPULATION TO SET TRIAL  
 DATE ON APRIL 14, 2009;  
 [PROPOSED] ORDER**

23 v.

24 CBS RADIO INC., et al.

25 Defendants.

1 WHEREAS, on August 25, 2008, the Court held a hearing in which it  
2 granted the motion filed by Nossaman LLP to be relieved as counsel for Plaintiffs  
3 Stan Lackey, aka John London and John London, Ltd. (collectively, "Plaintiffs");

4 WHEREAS, Plaintiffs are now represented by Bryan J. Freedman and  
5 Michael A. Taitelman of the law firm of Freedman & Taitelman, LLP, while  
6 Defendants continue to be represented by Christopher G. Caldwell and Linda M.  
7 Burrow of the law firm of Caldwell Leslie & Proctor, PC;

8 WHEREAS, at the August 25, 2008 hearing, the Court set a trial date of  
9 January 20, 2008, with all remaining pre-trial dates to be set at a further status  
10 conference to be held on October 6, 2008 at 3:00 pm, and ordered the parties to file  
11 a joint status report on or before September 29, 2008;

12 WHEREAS, the information available to Ms. Burrow at the August 25,  
13 2008 hearing did not reflect the fact that Mr. Caldwell would be on his honeymoon  
14 in South Africa from January 5 through January 19, 2009, returning only the day  
15 before the current January 20, 2009 trial date;

16 WHEREAS, as discussed at the August 25, 2008 hearing, counsel for  
17 Defendant CBS Radio Inc. has another trial beginning on January 26, 2009 in Los  
18 Angeles Superior Court;

19 WHEREAS, Plaintiffs' counsel is not available at any later date in January  
20 and, as Mr. Taitelman informed the Court at the August 25, 2008 hearing, is not  
21 available for trial in February or March 2008;

22 WHEREAS, after further consideration, the parties have agreed to extend  
23 the trial date to April 14, 2009, which is the earliest date available for all counsel;  
24 and

25 WHEREAS, the parties agree that all further dates should be set at the  
26 previously-scheduled October 6, 2008 status conference;

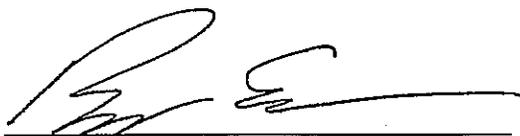
1 NOW THEREFORE, THE PARTIES HEREBY STIPULATE AND  
2 AGREE as follows:

- 3 1. Trial in this matter shall be set for April 14, 2009 at 8:30 am.  
4 2. A further status conference in this matter shall be set for October 6,  
5 2008 at 3:00 pm, as previously ordered;  
6 3. The parties shall file a joint status report no later than September 29,  
7 2008, as previously ordered.

8  
9 DATED: September 16, 2008 CALDWELL LESLIE & PROCTOR, PC

10  
11 By   
12 LINDA M. BURROW  
13 Attorneys for Defendants  
14 CBS RADIO INC.

15 DATED: September 16, 2008 FREEDMAN & TAITELMAN, LLP

16  
17 By   
18 BRYAN J. FREEDMAN  
19 Attorneys for Plaintiffs  
20 STAN LACKEY, aka JOHN LONDON,  
21 and JOHN LONDON, LTD.

22 IT IS SO ORDERED.

23  
24 Dated: 9/17/2008



25  
26  
27 HON. MARILYN H. PATEL  
28 UNITED STATES DISTRICT COURT JUDGE