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8 **UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**
11

12 LUCIA KANTER,) Case No. C-07-2423
13)
Plaintiff,)

14 v.)

15 CALIFORNIA ADMINISTRATIVE OFFICE) **STIPULATION TO CONTINUE CASE**
16 OF THE COURTS,) **MANAGEMENT CONFERENCE;**
17) **DECLARATION OF KATHRYN**
Defendant.) **BURKETT DICKSON IN SUPPORT OF**
) **REQUEST FOR CONTINUANCE**

18) CMC Date: August 7, 2007
19) Time: 2:00 p.m.
) Judge: Hon. Martin J. Jenkins
20)

21 **STIPULATION**

22 The parties, through their undersigned counsel, hereby request and stipulate that, subject
23 to the Court's approval, the Case Management Conference currently scheduled for August 7,

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28 //

1 2007, be continued to August 28, 2007.

2 IT IS SO STIPULATED.

3
4 Dated: July 11, 2007

DICKSON-ROSS LLP

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6 By Kathryn Burkett Dickson
7 Kathryn Burektt Dickson
8 Attorneys for Plaintiff,
LUCIA KANTER

9 Dated: July 11, 2007

HELLER EHRMAN LLP

10
11 By Greg J. Richardson
12 Greg J. Richardson
13 Brooke Andrich
14 Attorneys for Defendant
CALIFORNIA ADMINISTRATIVE
OFFICE OF THE COURTS

15 **DECLARATION OF KATHRYN BURKETT DICKSON**

16 I, Kathryn Burkett Dickson, declare as follows:

17 1. I am an attorney licensed to practice law in the State of California. I submit this
18 declaration in support of the parties' request to continue the Case Management Conference from
19 August 7, 2007 to August 28, 2007.

20 2. The Complaint in this case was filed on May 4, 2007. Defendant filed its Answer
21 on July 2, 2007, just one week ago.

22 3. I will be out of town on vacation from July 18, 2007 through August 7, 2007, and
23 will not be returning to town until the afternoon of August 7th – the day of the Case Management
24 Conference. Due to heavy litigation calendars and complex summer schedules, the parties will
25 be unable to complete the meet and confer process, exchange initial disclosures, and file the Case
26 Management Conference, before my departure next Tuesday.

27 4. Continuing the Case Management Conference to August 28th, will enable the
28 parties to fully meet and confer on all issues and exchange complete initial disclosures shortly

1 following my return, and to prepare the required Case Management Conference Statement
2 sufficiently in advance of the Case Management Conference. In addition, a continuance would
3 eliminate the obvious difficulty presented by the fact that, under the current schedule, I will not
4 be returning from out of town in time to attend the Conference on August 7th.

5 4. Both parties in this case are represented by experienced and cooperative counsel.
6 This short continuance will enable us to have more meaningful meet and confer discussions, and
7 to ensure that our initial disclosures are accurate and complete. In so doing, I believe the
8 continuance will promote the efficient and expeditious prosecution of this action.

9 I declare under penalty of perjury under the laws of the State of California that the
10 foregoing is true and correct and that this declaration was executed on July 11, 2007, in Oakland,
11 California.

12 
13 KATHRYN BURKETT DICKSON