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 20 Attorneys for Plaintiff,
 21 MICHAEL SIRBU

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

17 MICHAEL SIRBU,
 18
 19 Plaintiff,
 20 vs.
 21 NATIONWIDE CREDIT, INC.,
 22
 23 Defendant.

Case No.: CV-09-03633 MHP-EDL
 Hon. Marilyn H. Patel

**JOINT STIPULATION TO CONTINUE
 FURTHER CASE MANAGEMENT
 CONFERENCE TO JUNE 7, 2010;
 DECLARATIONS OF SARA L.
 MARKERT AND NICHOLAS
 BONTRAGER IN SUPPORT HEREOF;
 [PROPOSED] ORDER**

Complaint Filed: August 7, 2009
 Trial date: None scheduled

1 **WHEREAS**, a further case management conference is scheduled to be held in this matter
2 on May 17, 2010 at 3:00 p.m. in the above-captioned Court; and

3 **WHEREAS**, counsel for both Plaintiff and Defendant have another matter on calendar in
4 the Central District of California at 1:30 p.m. on May 17, 2010; and

5 **WHEREAS**, counsel for Plaintiff has a trial scheduled to begin on May 24, 2010; and

6 **WHEREAS**, the parties desire to continue the further case management conference to a
7 date when both counsel are available to attend;

8 **IT IS HEREBY STIPULATED**, as follows:

9 The further case management conference will be continued to Monday, June 7, 2010, at
10 3:00 p.m. in courtroom 15, 18th Floor, of the above-captioned courthouse.

11 **IT IS HEREBY AGREED:**

12 Dated: April 21, 2010

HOUSER & ALLISON, APC

13
14 By: /s/Sara L. Markert
Sara L. Markert
15 Attorney for Defendant,
Nationwide Credit, Inc.

16 Dated: April 21, 2010

KROHN & MOSS, LTD

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19 By: /s/ Nichols Bontrager
Nicholas Bontrager
20 Attorney for Plaintiff,
Michael Sirbu

1 **DECLARATION OF SARA L. MARKERT**

2 I, Sara L. Markert, declare as follows:

3 1. I am an attorney at law duly licensed to practice before the above entitled Court
4 and am an attorney with the law firm of Houser & Allison, A Professional Corporation, counsel
5 of record for Defendant, NATIONWIDE CREDIT, INC. (“NCI”). I have personal knowledge of
6 the facts set forth herein and if called as a witness could and would competently testify as to
7 those facts.

8 2. I submit this declaration in support of the Joint Stipulation to Continue the Further
9 Case Management Conference to June 7, 2010.

10 3. I am counsel of record in the matter *Vassil Krapf v. Nationwide Credit, Inc.*, Case
11 No. 8:09-cv-00711-JVS-MLG, currently pending in the Central District of California.

12 4. I filed a motion for summary judgment on behalf of NCI in the *Krapf* matter
13 which is scheduled to be heard on Monday, May 17, 2010, at 1:30 p.m. at the United States
14 District Court located at 411 W. Fourth Street, in Santa Ana, California.

15 5. I am unable to attend both the motion hearing in *Krapf* and the case management
16 conference in this action on May 17, 2010, due to the location and timing of the hearings.

17 6. I am available to attend a further case management conference in this matter on
18 Monday, June 7, 2010.

19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing is true and correct, and that this declaration was executed this 21st day of April, 2010,
21 at Long Beach, California.

22
23 */s/ Sara L. Markert*
24 Sara L. Markert
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1 **CERTIFICATE OF SERVICE**

2 STATE OF CALIFORNIA)
3) ss
4 COUNTY OF LOS ANGELES)

5 I am employed in the County of Los Angeles, State of California. I am over the age of 18
6 and not a party to the within action. My business address is 3760 Kilroy Airport Way, Long
7 Beach, California 90806.

8 On April 22, 2010, I served the following document(s) described as follows: **JOINT
9 STIPULATION TO CONTINUE FURTHER CASE MANAGEMENT CONFERENCE
10 TO JUNE 7, 2010; DECLARATIONS OF SARA L. MARKERT AND NICHOLAS
11 BONTRAGER IN SUPPORT HEREOF; [PROPOSED] ORDER**

12 On the following interested parties in this action:

13 Nicholas J Bontrager
14 Krohn & Moss Ltd
15 10474 Santa Monica Boulevard, Suite 401
16 Los Angeles, CA 90025
17 nbontrager@consumerlawcenter.com
18 *Attorney for Plaintiff*

19 **BY ELECTRONIC MAIL**—I hereby certify that I electronically transmitted the
20 attached document(s) to the Clerk’s Office using the CM/ECF System for filing and
21 transmittal of a Notice of Electronic Filing to the above listed CM/ECF registrants.

22 I declare under penalty of perjury, under the laws of the United States that the foregoing
23 is true and correct.

24 Executed on April 22, 2010, at Irvine, California.

25 /s/ Sara L. Markert
26 Sara L. Markert
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

MICHAEL SIRBU,

 Plaintiff,

 vs.

NATIONWIDE CREDIT, INC.,

 Defendant.

Case No.: CV-09-03633 MHP-EDL

Hon. Marilyn H. Patel

**~~[PROPOSED]~~ ORDER CONTINUING
FURTHER CASE MANAGEMENT
CONFERENCE TO JUNE 7, 2010**

Complaint Filed: August 7, 2009
Trial date: None scheduled

Pursuant to the parties' **JOINT STIPULATION TO CONTINUE FURTHER CASE
MANAGEMENT CONFERENCE TO JUNE 7, 2010**, good cause so appearing,

IT IS SO ORDERED.

Dated: 4/23/2010

