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 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

12 LYNDA JANES DANGERFIELD,
 13 Plaintiff,
 14 v.
 15 SUE FOX and ETIQUETTE SURVIVAL
 LLC and DOES 1 through 50,
 16 Defendants.

Case No. 3:09-cv-04397-JL

**JOINT REQUEST TO CONTINUE
 SETTLEMENT CONFERENCE AND TO
 CONTINUE CASE MANAGEMENT
 CONFERENCE**

Date: December 16, 2010
Crtrm.: C
Time: 9:30 a.m.
Judge: Hon. Edward M. Chen

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 20 AND RELATED CROSS-ACTION
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22 **JOINT REQUEST**

23 TO THE HONORABLE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS
 24 OF RECORD:

25 WHEREAS, the Court had previously scheduled a Settlement Conference for December
 26 16, 2010 with the Honorable Edward M. Chen and a further Case Management Conference for
 27 January 12, 2011.

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1 WHEREAS, the Parties intended to complete the discovery necessary to be prepared for
2 the Settlement Conference prior to the scheduled date.

3 WHEREAS, the Parties have been unable to complete the necessary discovery for the
4 reasons stated in the declaration of Brian M. Affrunti below and request a brief continuance of the
5 Settlement Conference and the corresponding Case Management Conference.


6 WHEREAS, the clerk for the Hon. Edward M. Chen has advised counsel that the earliest
7 available date for a Settlement Conference is January 28, 2011. The first mutually-available date
8 for the Hon. Edward M. Chen, the parties and counsel is February 11, 2011.

9 NOW, THEREFORE, the parties stipulate and respectfully request that the Court extend
10 the deadline to complete the Settlement Conference by a period of ninety days and enter an order
11 continuing the Settlement Conference until February 11, 2011, or as soon thereafter as the matter
12 may be heard. The parties further stipulate and respectfully request that the Court continue the
13 corresponding Case Management Conference until two weeks after the continued Settlement
14 Conference..

15 IT IS SO STIPULATED.

16 Dated: December 9, 2010

Burke, Williams & Sorensen, LLP

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18 By: 
19 DOUGLAS W. DAL CIELO
20 Attorneys for Plaintiff/Cross-Defendant
LYNDA JANES DANGERFIELD

21 Dated: December 9, 2010

MORALES LAW FIRM

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23 By: /S/
24 DAVID P. MORALES
25 Attorneys for Defendants/Cross-
26 Complainant SUE FOX and ETIQUETTE
27 SURVIVAL, LLC
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DECLARATION OF BRIAN M. AFFRONTI

I, Brian M. Affrunti, declare as follows:

1. I am an attorney at law licensed to practice in all courts of the State of California and the Northern District of California and am an associate at Burke, Williams & Sorensen, LLP, attorneys of record for Plaintiff and Cross-Defendant LYNDA JANES DANGERFIELD (“Ms. Dangerfield” or “Plaintiff”) in the above-entitled action. I have personal knowledge of the facts set forth herein, unless stated on information and belief, and if called upon as a witness, I could competently testify to the facts set forth herein.

2. Ms. Dangerfield’s mother suffered two terrible falls in the past approximate one month. In the second fall, she sustained a compression fracture of her spine and has required full-time care since her release from the hospital.

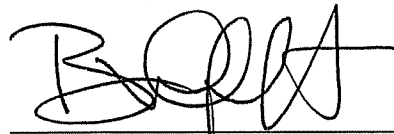
3. During this period of time, Ms. Dangerfield has been the sole care provider for her mother as her mother has taken residence with her. Ms. Dangerfield has been caring for her mother around the clock and simultaneously looking for a permanent senior living/nursing facility for her mother to move into.

4. As a result, Ms. Dangerfield has been unable to dedicate the time necessary to respond to the written discovery propounded by Defendant and Cross-Complainant SUE FOX.

5. If Ms. Dangerfield’s mother is still residing with her on December 16, 2010, it would be difficult for Ms. Dangerfield to attend the settlement conference as she will need to make arrangements for someone to care for her mother in her absence.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 9th day of December 2010, at Menlo Park, California.



BRIAN M. AFFRONTI

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~~PROPOSED ORDER~~

Pursuant to the Joint Request of the Parties for Continuance of the Settlement Conference and the corresponding Case Management Conference, IT IS HEREBY ORDERED AS FOLLOWS:

The deadline for completing the Settlement Conference with the Hon. Edward M. Chen shall be extended for ninety days from the date of this Order.

The Settlement Conference is continued from December 16, 2010 until February 22, 2011. Parties shall submit Settlement Conference Statements two weeks in advance of the Settlement Conference in accordance with this Court's September 7, 2010 Order.

The Case Management Conference is continued from January 12, 2011 until March 2, 2011. A joint case management statement is due by February 23, 2011.

Date: December 13, 2010


HON JAMES LARSON