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14 Attorneys for Defendant Margaret Goodman Reid

15 **UNITED STATES DISTRICT COURT**
 16 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

17 GUARDS POLO CLUB HOLDINGS LTD.,

18 Plaintiff,

19 vs.

20 MEGAN GOODMAN REID, MICHAEL
 21 KOSKIE (a/k/a MICHAEL MCGREGOR),
 22 AND JOHN/JANE DOES 1-20

23 Defendants.

CASE NO. 11-cv-01817 SC

[Assigned to the Honorable Samuel Conti]

**JOINT STIPULATION TO STAY AND
 CONTINUE THE PRE-TRIAL
 SCHEDULE & FOR A NEW TRIAL
 DATE IN ORDER TO ATTEMPT TO
 FINALIZE A SETTLEMENT**

JUDGE: Hon. Samuel Conti

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1 Plaintiff Guards Polo Club Holdings Ltd. (“Plaintiff”) and Defendant Megan Goodman
2 Reid (“Defendant”) hereby enter into this Stipulation and request that the Court set a new date for
3 trial, presently set for May 31, 2012 at 9:30 a.m., on a date at the end of September 2012 and to
4 stay and continue the Pre-Trial Schedule set forth in the Court’s Status Conference Order, dated
5 August 26, 2011, accordingly. This request is being made because the parties participated in a full
6 day mediation on October 18, 2011, as a result of which they are currently in serious and advanced
7 discussions to resolve the case. Specifically, Defendant Reid needs 60 days to explore certain
8 financial arrangements related to any settlement. Further, the parties anticipate that they may need
9 an additional 60 days to finalize any settlement reached and to allow Defendant Reid to secure
10 financing that will permit her to consummate the terms of any settlement.

11 The parties would like to devote their full energies towards resolving this case since they
12 believe the prospects of resolution are good and such a stay and continuance will avoid the parties
13 incurring legal fees that could be driven by pending deadlines. Moreover, while the parties are
14 focused on resolution of this entire matter, they believe it is preferable to avoid serving the Doe 1
15 defendant, and request is therefore also made to extend the time to effectuate service on the Doe 1
16 defendant.

17 THEREFORE, BASED UPON THE FOREGOING, PLAINTIFF AND DEFENDANT
18 DO HEREBY STIPULATE AS FOLLOWS AND REQUEST THE COURT ENTER AN ORDER
19 CONSISTENT WITH THE FOLLOWING:

20 1. The trial date be continued to September 24, 2012, or on such date and at such time
21 as is convenient for the Court thereafter, and the pre-trial schedule set forth in the Status
22 Conference Order be continued such that each date mentioned there is reset to the equivalent day
23 four months later than mentioned in the Status Conference Order.

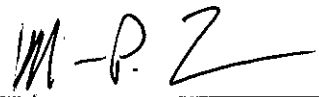
24 2. The date by which Plaintiff must effectuate service on the Doe 1 defendant be
25 extended from December 29, 2011 to February 1, 2012.

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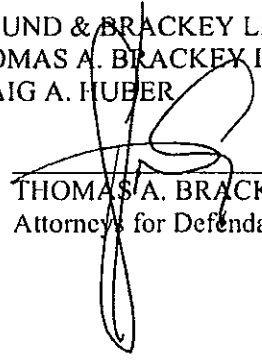
DATED: ~~October~~ ^{November-10} , 2011

CONNON WOOD SCHEIDEMANTLE LLP
NICHOLAS P. CONNON

By: 
NICHOLAS P. CONNON
Attorneys for Plaintiff Guards Polo Club Holdings Ltd.

DATED: ~~October~~ ^{November 9} , 2011

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THOMAS A. BRACKEY II
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AND JOHN/JANE DOES 1-20

22 Defendants.
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CASE NO. 11-cv-01817 SC

[Assigned to the Honorable Samuel Conti]

**[PROPOSED] ORDER FOR A STAY AND
CONTINUANCE OF THE PRE-TRIAL
SCHEDULE & FOR A NEW TRIAL
DATE**

JUDGE: Hon. Samuel Conti

1 The parties to the above-entitled action having agreed to a new date for trial currently set
2 for May 31, 2012 at 9:30 a.m., and to stay and continue the pre-trial schedule as described in the
3 Status Conference Order, dated August 26, 2011.

4 PURSUANT TO STIPULATION, IT IS ORDERED that the new trial date is set for
5 September 24, 2012 at 9:30 a.m., before the Honorable Judge Samuel Conti and that the pre-trial
6 schedule and dates contained in the Status Conference Order are each continued for a period of
7 120 days from the dates set forth therein. Further, Defendant shall have until February 1, 2012 to
8 serve the Doe 1 defendant.

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10 November 14, 2011
11 DATED: ~~October~~ November, 2011

