		3
		4
1114 Fremont Avenue	South Pasadena, CA 91030-3227	5
		6
		7
		8
		9
		10
		11
		12
		13
		14
		15
		16
		17
		18
		19
		20
		21
		22
		23
		24

25

26

27

28

1	Thomas P. Riley (SBN 194706)		
2	LAW OFFICES OF THOMAS P. RILEY, P.C.		
	First Library Square		
3	1114 Fremont Avenue		
	South Pasadena CA 91030-3227		
4	Telephone No. (626) 799-9797		
	Facsimile No. (626) 799-9795		
5	TPRLAW@att.net		
	Attorneys for Plaintiff		
6	Innovative Sports Management, Inc.		
7			
	Richard J. Wallace (SBN 124286)		
8	BRISCOE IVESTER & BAZEL, LLP		
	155 Sansome Street, 7 <sup>th</sup> Floor		
9	San Francisco, CA 94104		
10	Telephone No. (415) 832-9287		
	Facsimile No. (415) 398-5630		
11	rwallace@briscoelaw.net		
	Attorneys for Defendant		
12	Salvador M. Lopez		
12			

INNOVATIVE SPORTS MANAGEMENT, INC.,

## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION

Case No. 3:11-CV-03817-EMC

Plaintiff, vs.	UPDATED JOINT CASE MANAGEMENT CONFERENCE STATEMENT; and (PROPOSED) ORDER
SALVADOR M. LOPEZ.	FOR: Hon. Edward M. Chen
Defendant.	DATE: Friday, September 14, 2012 TIME: 10:30 A.M.

At the Case Management Conference in this Action on August 7, 2012, counsel for Plaintiff and Defendant advised the Court that the parties were engaged in settlement discussions, the Plaintiff having submitted a settlement demand to Defendant on August 2, 2012, and counsel requested the opportunity to pursue those settlement discussions before further proceedings in the Action are

JOINT CASE MANAGEMENT CONFERENCE STATEMENT CASE NO. 3:11-CV-03817-EMC PAGE 1

required. The Court continued the Case Management Conference to September 14, 2012 and extended the deadline for Defendant's answer to September 7, 2012 (Dkt. 24.) The Court requested an "updated" Joint Case Management Conference Statement by September 7, 2012 advising the 3 Court of new developments, without the necessity of reiterating the matters in the prior Joint Case Management Statement filed on July 25, 2012 (Dkt. 23.) This Updated Joint Case Management Conference Statement is filed in accordance with those directions of the Court. 6 The parties are still engaged in meaningful settlement negotiations, although they have not 7 resulted in a settlement. The parties believe that further negotiations without the necessity of court 8 proceedings may be productive and respectfully respect another brief one-month continuance of the Case Management Conference and extension of the deadline for Defendant's answer to the 10 Complaint to allow those negotiations to continue. The parties jointly request that the Court enter an 11 Order accordingly. 12 13 14 Date: September 7, 2012 15 /s/ Thomas P. Riley LAW OFFICES OF THOMAS P, RILEY, P.C. 16 By: Thomas P. Riley Attorneys for Plaintiff 17 Innovative Sports Management, Inc. 18 19 20 Date: September 7, 2012 /s/ Richard J. Wallace 21 **BRISCOE IVESTER & BAZEL, LLP** By: Richard J. Wallace 22 Attorneys for Defendant 23 Salvador M. Lopez 24 25 26 27 28

continued to \_\_\_\_

8

9

10

12

Dated:

13

14

16

17

18 ///

19 ///

20 ///

/// 21

/// 22

/// 23

///

25

26 27

/// 28

IT IS SO ORDERED Acthern District of California

The Updated Case Management Statement and Proposed Order is hereby adopted by the

Court and good cause appear therefor it is ordered that the Case Management Conference is \_\_\_\_\_, 2012 at  $\frac{10:30}{}$  a.m. in Courtroom 5, 17<sup>th</sup> Floor, San Francisco,

CA, and Defendant's answer shall be filed by Oct. 9 , 2012.

Oct. 26

September 13, 2012

## PROOF OF SERVICE (SERVICE BY MAIL)

2

3

7

8

9 10

11

12 13

14

15 16

17

18

19 20

21

23

22

24

25 26

27

28

I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is First Library Square 1114 Fremont Avenue, South Pasadena, California 91030. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On September 7, 2012I served:

## UPDATED JOINT CASE MANAGEMENT CONFERENCE STATEMENT

On all parties referenced by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was duly mailed and addressed to:

Mr. Richard J. Wallace, Esq. Briscoe Ivester & Bazel, LLP 155 Sansome Street, 7<sup>th</sup> Floor San Francisco, CA 94104

Email: rwallace@briscoelaw.net

(Attorneys for Defendant) Salvador M. Lopez

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct and that this declaration was executed on September 7, 2012, at South Pasadena, California.

/s/ Vane<u>ssa Morales</u> Dated: September 7, 2012

VANESSA MORALES