19 20 21	Plaintiff, vs. INTERNATIONAL TRANSPORTATION	STIPULATION AND [PROPOSED] ORDER TO CHANGE JOINT CASE MANAGEMENT CONFERENCE DATE Complaint Filed: December 21, 2011
21 22 23 24 25 26 27 28 EMARD DANOFF PORT TAMULSKI & PAETZOLD LLP	SERVICES, INC., and/or TRANSBAY CONTAINER TERMINAL, INC., Defendants.	CURRENT CMC DATE: July 6, 2012 PROPOSED CMC DATE: July 20, 2012
		- 1 -

1	Pursuant to this Court's Case Management Conference Order entered on May 23, 2012,	
2	Plaintiff Dave Williams and Defendant TransBay Container Terminal, Inc., through their	
3	respective counsel, hereby stipulate that, subject to approval by the Court, and for the reasons set	
4	forth below, the Joint Case Management Conference currently scheduled for July 6, 2012 be	
5	changed to July 20, 2012.	
6	GOOD CAUSE offered: lead Defense Attorney, Raymond M. Paetzold will be out of the	
7	state on a family matter from July 5, 2012 to July 9, 2012. Attorney Paetzold is the counsel of	
8	record for Defendant and the attorney most familiar with the issues and best prepared to address	
9	the matters referred to in the Court's Case Management Conference Order entered on May 23,	
10	2012. July 20, 2012 is the next day on this Court's calendar on which counsel for both parties	
10	are available. Accordingly, the parties respectfully request that the Case Management	
12	Conference currently set for July 6, 2012 at 2:30 p.m. be rescheduled for July 20, 2012, at the	
13	same time and courtroom.	
14	The parties intend to file their joint Case Management Statement and complete the	
15	exchange of their Initial Disclosures under Rule 26, Federal Rules of Civil Procedure by June 29,	
16	2012.	
17	SO STIPULATED.	
18	DATED: June 21, 2012 BIRNBERG & ASSOCIATES	
19		
20	By <u>/s/ Cory A. Birnberg</u>	
21	Cory A. Birnberg Attorney for Plaintiff Dave Williams	
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23	DATED: June 21, 2012 EMARD DANOFF PORT TAMULSKI & PAETZOLD LLP	
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25	By: <u>/s/ Raymond M. Paetzold</u> Raymond M. Paetzold	
26	Attorneys for Defendant	
27	TransBay Container Terminal, Inc.	
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Emard Danoff Port Tamulski & Paetzold LLP	- 2 -	
49 Stevenson Street Suite 400 San Francisco, CA 94105	STIPULATION AND [PROPOSED] ORDER TO CHANGE JOINT CASE MANAGEMENT CONFERENCE DATE Case No. CV 11-6596	

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1	<u>Certification of Signatures</u> I attest that the content of this document is acceptable to all persons above, who
2	
3	were required to sign it.
4	/s/ Raymond M. Paetzold Raymond M. Paetzold
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Emard Danoff Port Tamulski & Paetzold LLP	- 3 -
49 Stevenson Street Suite 400 San Francisco, CA 94105	STIPULATION AND [PROPOSED] ORDER TO CHANGE JOINT CASE MANAGEMENT CONFERENCE DATE Case No. CV 11-6596
	G:\24147.243 Williams\Pleadings\Stip to change CMC date.doc

1	IT IS SO ORDERED.
2	The Initial Case Management Conference is hereby set for July 20, 2012 at 02:30 p.m. in
3	Courtroom 10, 19 th Floor, San Francisco.
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6	Dated: <u>6/26/12</u>
7	SUSAN ILLSTON United States District Judge
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EMARD DANOFF PORT TAMULSKI & PAETZOLD LLP 49 Stevenson Street Suite 400	- 4 - STIPULATION AND [PROPOSED] ORDER TO CHANGE JOINT CASE MANAGEMENT CONFERENCE DATE
San Francisco, CA 94105	Case No. CV 11-6596 G:\24147.243 Williams\Pleadings\Stip to change CMC date.doc