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Attorneys for Plaintiff ALLEN SHAHAN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ALLEN SHAHAN,)	No. CV 13 3594 NC
)	
Plaintiff,)	
)	
vs.)	JOINT STIPULATED REQUEST
)	FOR THE CONTINUANCE OF
GOLDEN STATE BRIDGE, INC.,)	DEFENDANT’S MOTION FOR
)	SUMMARY JUDGMENT AND
Defendant.)	[PROPOSED] ORDER THEREON
)	AS MODIFIED

WHEREAS:

- This Claim is currently set for trial on March 9, 2015.
- Defendant GOLDEN STATE BRIDGE, INC.’S Motion for Summary Judgment herein is scheduled to be heard on February 4, 2015, and the deadline for Plaintiff to file his opposition thereto is Wednesday, January 14, 2015.
- Plaintiff’s Counsel, John R. Hillsman and Abraham Feinstein Hillsman, currently have a conflicting Jury trial that began on December 1, 2014, and is continuing. ("Conflicting Matter"). The Conflicting Matter is entitled *Michael Prickett and Marya Takamori- Prickett v. Bonnier Corporation; Warren Miller Entertainment, Inc.; Bare Sports Canada, LTD; Bare Sports USA, Corp. and Does 1 through 30 inclusive*, (County of Alameda Case No RG12655617)
- Plaintiffs’ counsel have reason to believe that the conclusion of the trial of the Conflicting Matter will not occur prior to the above-mentioned January 14, 2015 filing deadline.

1 THEREFORE, THE PARTIES HEREBY JOINTLY STIPULATE AND REQUEST THAT:

2 1. Defendants Motion for Partial Summary Judgment herein be taken off calendar for
3 1:00 p.m. on February 4, 2015.

4 2. Defendant's Motion for Partial Summary Judgment be reset for hearing on
5 Wednesday, February 18, 2015, at 1:00 p.m. in Courtroom 7 of this Court, located at 280 South
6 1st Street, San Jose, California 95113.

7 3. The date for Plaintiff to submit his opposing papers to Defendant's Motion for
8 Summary Judgment shall be continued from January 14, 2015, to the new date of January 28, 2015.

9 4. The date for Defendant to submit its reply papers to Plaintiff's opposition shall be
10 continued from January 23, 2015 to the new date of Friday, February 6, 2015.
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13
14 Dated: January 8, 2015

McGUINN, HILLSMAN & PALEFSKY
Attorneys for Plaintiff ALLEN SHAHAN

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17 By: /s/ JOHN R. HILLSMAN
JOHN R. HILLSMAN

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19
20 Dated: January 9, 2015

COX, WOOTTON, LERNER, GRIFFIN,
HANSON & POULOS
Attorneys for Defendant
GOLDEN STATE BRIDGE, INC.

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24 By: /s/ RICHARD R. WOOTTON
RICHARD R. WOOTTON

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28 **ATTESTATION OF COUNSEL AS TO SIGNATURE**

Pursuant to Civil Local Rule 5-1(i)(3 regarding signatures, John R. Hillsman
hereby attests that concurrence in the filing of this document has been obtained.

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~~PROPOSED~~
ORDER

The parties' Joint Stipulation and Proposed Order is hereby adopted by the Court, and the Court hereby orders that:

- 1. Defendant's Motion for Partial Summary Judgment is continued from February 4, 2015, to the new date of Wednesday, February ~~18~~²⁵, 2015, at ~~1:00~~^{2:00} p.m. in Courtroom 7 of this Court, located at 280 South 1st Street, San Jose, California;
- 2. Plaintiff's deadline to submit opposing papers to Defendant's Motion for Summary Judgment is continued from January 14, 2015 to the new date of Wednesday, January 28, 2015; and,
- 3. Defendant's deadline to submit reply papers to Plaintiff's opposition to Defendant's Motion for Summary Judgment is continued from January 23 to the new date of Friday, February 6, 2015.

IT IS SO ORDERED.
Dated: January 12, 2015

