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

11 Richard Knudsen, an individual, Qui Tam
 Plaintiff, on behalf of himself and United
 12 States of America and its Federal Agencies, a
 public entity,
 13

14 Plaintiffs,

15 v.

16 CELLCO PARTNERSHIP, d / b / a
 17 VERIZON WIRELESS, INC.
 CELLCO PARTNERSHIP
 18 VERIZON WIRELESS
 19 VERIZON COMMUNICATIONS, Inc.,
 20 VERIZON BUSINESS
 ALLTEL CORPORATION
 21 VERIZON FEDERAL INC.
 VERIZON SERVICES CORP.
 22 VERIZON BUSINESS NETWORK
 SERVICES, INC.
 23 VODAFONE
 24 and Does 1-100,
 25
 26 Defendants.

Case No.: *CV 13 4465 EDL*

**PLAINTIFF'S EX PARTE REQUEST FOR
 CONTINUANCE OF THE CASE
 MANAGEMENT CONFERENCE, AND
 THE JOINT STATEMENT**

Trial Date: TBD

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1 Plaintiff hereby request from the Court a continuance of the Case Management Conference
2 currently set for November 18, 2014 at 10:00 am.


3 Please note that Defendants ALLTEL COMMUNICATIONS, LLC., VERIZON
4 FEDERAL INC., VERIZON SERVICES CORP., VODAFONE US OPERATIONS INC.,
5 VERIZON BUSINESS NETWORK SERVICES INC., and VERIZON WIRELESS SERVICES,
6 LLC have been served at 818 W. 7th Street, Los Angeles, CA 90017, on October 27, 2014, but have
7 not appeared and have not been dismissed.

8 Due to the complexity of issues, Plaintiff is currently working with Defendants to
9 voluntarily limit the parties to the correct entities and effectuate service. Defendants have retained
10 Leigh R. Schachter at Verizon Wireless as counsel.

11 Plaintiff's counsel has just recently been in contact with Mr. Schachter as of this week.

12 According to the court's Order, parties shall file a joint case management statement.
13 However, Plaintiff requests a 45 day continuance for the defendants to have an opportunity to appear
14 in this matter.

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16 Dated: 11-11-14


Aimee E. Kirby, Esq.
Attorney for Plaintiff

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19 **[PROPOSED] ORDER**

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21 IT IS HEREBY ORDERED THAT:

- 22 1. The Case Management Conference, currently scheduled for November 18, 2014 be
23 continued to 10:00 am on 1/6/15 .
- 24 2. The parties shall file a joint case management conference statement no later than
25 12/30/14 .

26 IT IS SO ORDERED.

27
28 Dated: November 13, 2014


HON. ELIZABETH D. LAPORTE