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5 Attorneys for Defendant TRAVELERS CASUALTY
 6 INSURANCE COMPANY OF AMERICA

7
 8 **UNITED STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA**

10
 11 PHO THANH PHAT, INC. dba PHO LEE
 HOA PHAT,

3:14-CV-03822-LB

12 Plaintiff,

**STIPULATION AND PROPOSED
 ORDER TO CONTINUE INITIAL
 CASE MANAGEMENT
 CONFERENCE**

13 vs.

14 TRAVELERS CASUALTY INSURANCE
 15 COMPANY OF AMERICA, AND DOES 1
 TO 10,

Complaint filed: March 6, 2014
 Trial Date: Not Yet Set

16 Defendants.

17 /

18 Defendant TRAVELERS CASUALTY INSURANCE COMPANY OF AMERICA

19 (“Defendant” or “Travelers”) and Plaintiff PHO THANH PHAT, INC. dba PHO LEE HOA PHAT

20 (“Plaintiff”), by and through their attorneys of record, stipulate as follows:

21 1. The Court has set an Initial Case Management Conference in this matter for
 22 November 20, 2014.

23 2. Counsel for Plaintiff has indicated that Plaintiff intends to amend its complaint in
 24 this matter.

25 3. In addition, the parties are interested in entering into confidential settlement
 26 discussions in an attempt to informally resolve this matter.

27 4. Therefore the parties request that the Initial Case Management Conference in this
 28 matter be continued for at least sixty (60) days to allow the parties to attempt to informally resolve

1 this matter, and, if necessary, for Plaintiff to amend its complaint.

2 5. There have been no prior requests for a continuance on this Case Management
3 Conference.

4 NOW, THEREFORE, by and through their undersigned counsel of record, Defendant
5 TRAVELERS CASUALTY INSURANCE COMPANY OF AMERICA and Plaintiff PHO
6 THANH PHAT, INC. dba PHO LEE HOA PHAT hereby stipulate to the following:

- 7 1. The date for the Initial Case Management Conference in this matter shall be continued
8 from November 20, 2014 to January 29, 2014 at 11:00 a.m. in Courtroom C.
9 2. The last day to file Rule 26(f) Report, complete initial disclosures or state objection in
10 Rule 26(f) Report and file Case Management Statement shall be continued to January
11 22, 2015.

12
13 DATED: November 12, 2014

**FORAN GLENNON PALANDECH
PONZI & RUDLOFF PC**

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16 By: /s/ Marjie D. Barrows
17 Marjie D. Barrows
Kathleen M. DeLaney

18 Attorneys for Defendant TRAVELERS
19 CASUALTY INSURANCE COMPANY OF
20 AMERICA

21
22 DATED: November 12, 2014

VU S.A. LAW OFFICES, APC

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24 By: /s/ Michael C. Vu
25 Michael Chinh Vu

26 Attorney for Plaintiff PHO THANH PHAT, INC.
27 dba PHO LEE HOA PHAT
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[PROPOSED] ORDER

1. The date for the Initial Case Management Conference in this matter is continued from November 20, 2014 to January 29, 2014 at 11:00 a.m. in Courtroom C.
2. The last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement is continued to January 22, 2015.

IT IS SO ORDERED.

DATED: November 13, 2014

By: : 
HON. LAUREL BEELER
U.S. DISTRICT JUDGE

