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Thomas P. Riley, SBN 194706 LAW OFFICES OF THOMAS P. RILEY, P.C. First Library Square 1114 Fremont Avenue South Pasadena, CA 91030 3 Tel: 626-799-9797 Fax: 626-799-9795 TPRLAW@att.net **Attorneys for Plaintiff** J & J Sports Productions, Inc. 7 UNITED STATES DISTRICT COURT 8 NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION 9 10 J & J SPORTS PRODUCTIONS, INC., CASE NO. 3:14-cv-03925-VC 11 Plaintiff, PLAINTIFF'S EX PARTE 12 APPLICATION FOR AN ORDER VS. CONTINUING THE INITIAL CASE 13 **MANAGEMENT CONFERENCE; AND** IGNACIO BERMUDEZ, ORDER (Proposed) 14 15 Defendant. 16 17 TO THE HONORABLE VINCE CHHABRIA, THE DEFENDANT, AND HIS 18 ATTORNEY/S OF RECORD: Plaintiff J & J Sports Productions, Inc. hereby applies ex parte for an order continuing the 19 Initial Case Management Conference in this action, presently set for Tuesday, January 20, 2015 at 20 10:00 A.M. to a new date approximately thirty (30) to forty-five (45) days forward. This request is 21 necessitated by the fact that Plaintiff's counsel has recently perfected service on defendant Ignacio 22 Bermudez. A true and correct copy of the Proof of Service have been filed with this Honorable Court, 23 as docket entry 14. 24 As such, as of this writing, Plaintiff has yet to receive an answer or any other responsive 25

PLAINTIFF'S EX PARTE APPLICATION FOR AN ORDER CONTINUING THE INITIAL CASE MANAGEMENT CONFERENCE; AND ORDER (Proposed) CASE NO. 3:14-cv-03925-VC PAGE 1

case itself or the preparation of a Joint Case Management Conference Statement.

pleading from the defendant. As a result, Plaintiff's counsel has not conferred with the defendant

concerning the claims, discovery, settlement, ADR or any of the other pertinent issues involving the

WHEREFORE, Plaintiff respectfully requests that this Honorable Court continue the Initial Case Management Conference presently scheduled for Tuesday, January 20, 2015 to a new date approximately thirty (30) to forty-five (45) days forward. Respectfully submitted, Dated: January 15, 2015 /s/ Thomas P. Riley LAW OFFICES OF THOMAS P. RILEY, P.C. By: Thomas P. Riley Attorneys for Plaintiff J & J Sports Productions, Inc. /// /// /// /// /// 

PLAINTIFF'S EX PARTE APPLICATION FOR AN ORDER CONTINUING THE INITIAL CASE MANAGEMENT CONFERENCE; AND ORDER (Proposed) CASE NO. 3:14-cv-03925-VC PAGE 2

1	ORDER (Proposed)
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3	It is hereby ordered that the Initial Case Management Conference in civil action number 3:14-cv-
4	03925-VC styled J & J Sports Productions, Inc. v. Ignacio Bermudez, is hereby continued from
5	Tuesday, January 20, 2015 at 10:00 A.M. to a new date of March 17, 2015.
6	Plaintiff shall serve a copy of this Order on the Defendant and thereafter file a Certification of
7	Service of this Order with the Clerk of the Court.
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11	IT IS SO ORDERED:
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14	THE HONORABLE VINCE CHHABRIA  Dated: January 16, 2015
15	United States District Court
16	Northern District of California
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