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6 Attorneys for Plaintiff CHRISTINA HANSON

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8 IN THE UNITED STATES DISTRICT COURT
 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

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11 CHRISTINA HANSON, 12 Plaintiff, 13 v. 14 JOHN MUIR HEALTH, and DOES I through X, inclusive 15 Defendant. 16) Case No. 4:14-cv-3492-PJH)) PLAINTIFF'S REQUEST AND [PROPOSED]) ORDER TO RESET CASE MANAGEMENT) CONFERENCE AND RELATED CASE) DEADLINES)))
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19 NOW COMES the plaintiff, by and through her counsel, to request as follows:
 20 WHEREAS, plaintiff filed her original complaint on August 1, 2014 which was not served
 21 on defendant, but instead plaintiff filed a First Amended Complaint on September 22, 2014;
 22 WHEREAS, plaintiff served defendant with the First Amended Complaint, Summons and
 23 other required papers by personally delivering them to Jennifer LaValley who was the person
 24 apparently in charge at defendant's office on September 25, 2014, and copies of those same
 25 papers were mailed to defendant on September 26, 2014;

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WHEREAS, the case schedule currently includes the following deadlines:

October 9, 2014: Last day to

- Meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan
- File ADR certification signed by Parties and Counsel
- File either Stipulation to ADR Process or Notice of Need for ADR Phone Conference

October 23, 2014: Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per attached Standing Order re Contends of Joint Case Management Statement

Last day to file a joint case management statement

October 30, 2014: Case Management Conference scheduled for 2:00 p.m.;

WHEREAS, defendant has not yet appeared in this action and defendant's answer is not due until shortly before the date currently set for the Case Management Conference;

WHEREAS, plaintiff's counsel attempted to contact defendant to meet and confer regarding continuing the case management conference and related dates but has not yet heard back from defendant;

WHEREAS, pursuant to the Court's order, lead counsel must appear at the Case Management Conference on October 30, 2014 and plaintiff's lead counsel, Jody LeWitter, is scheduled to conduct a deposition in New York on that date in case *Smith v. Jefferies Group LLC, et al.*, Northern District of California, Case No. 3:13-cv-03182-TEH.

THEREFORE, plaintiff requests that the Court continue the Case Management Conference and all related dates for at least 45 days and plaintiff offers the following proposed schedule as a suggestion to the Court:

November 26, 2014: Last day to

- Meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan
- File ADR certification signed by Parties and Counsel
- File either Stipulation to ADR Process or Notice of Need for ADR Phone Conference

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December 11, 2014: Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per attached Standing Order re Contends of Joint Case Management Statement

Last day to file a joint case management statement

December 18, 2014: Case Management Conference scheduled for 2:00 p.m.

DATED: October 8, 2014

SIEGEL LEWITTER MALKANI

By: /s/ Jean Krasilnikoff
Jody I. LeWitter
Jean Krasilnikoff

Attorneys for Plaintiff

[PROPOSED] ORDER

This matter having come before the Court upon the written request of plaintiff, which is attached hereto, it is hereby ordered that the Initial Case Management Conference and related deadlines will be modified as follows:

November 26, 2014: Last day to

- Meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan
- File ADR certification signed by Parties and Counsel
- File either Stipulation to ADR Process or Notice of Need for ADR Phone Conference

December 11, 2014: Last day to

- File Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per attached Standing Order re Contends of Joint Case Management Statement
- Last day to file a joint case management statement

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1 December 18, 2014: Case Management Conference scheduled for 2:00 p.m.

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3 **IT IS SO ORDERED.**

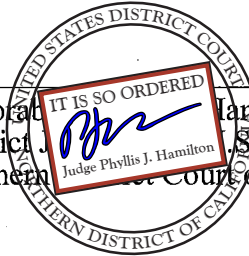
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6 DATED October 10, 2014

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Honorable Judge Phyllis J. Hamilton
District Court of California
Northern District of California



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PROOF OF SERVICE

I declare that I am employed in the county of Alameda, California. I am over the age of eighteen years and not a party to the within action. My business address is 1939 Harrison Street, Suite 307, Oakland, California 94612.

On October 8, 2014, I served the within documents:

PLAINTIFF'S REQUEST AND [PROPOSED] ORDER TO RESET CASE MANAGEMENT CONFERENCE AND RELATED CASE DEADLINES

on the interested party(ies) herein by sending true copies as follows:

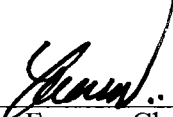
Calvin Knight *Agent for service of process*
John Muir Health
1400 Treat Boulevard
Walnut Creek, CA 94597

(BY MAIL) Each such envelope, with postage thereon fully prepaid, was placed in the United States mail at Oakland, California. I am readily familiar with this firm's business practice for collection and processing of correspondence for mailing with the U.S. Postal Service pursuant to which practice the correspondence will be deposited with the U.S. Postal Service this same day in the ordinary course of business.

(BY HAND DELIVERY) I served the above-described documents on the interested parties listed above by personally hand delivering copies thereof to the address shown above.

(BY MESSENGER/COURIER SERVICE) I served the above-described documents on the interested parties listed above by arranging for hand delivery of copies thereof by with an outside messenger service, an employee of which company picked up the documents from the offices of Siegel LeWitter Malkani and was directed to hand deliver copies thereof to the address shown above.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on October 8, 2014 at Oakland, California.



Frances Chen