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9 **Attorneys for Plaintiff**
10 **J & J Sports Productions, Inc.**

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **OAKLAND DIVISION**

14 **J & J SPORTS PRODUCTIONS, INC.,**

15 **Plaintiff,**

16 **vs.**

17 **JESUS SEGURA CERVANTES a/k/a**
18 **JESUS SEGURA,**

19 **Defendant.**

20 **CASE NO. 4:14-cv-03954-JSW**

21 **PLAINTIFF'S EX PARTE**
22 **APPLICATION FOR AN ORDER**
23 **CONTINUING THE INITIAL CASE**
24 **MANAGEMENT CONFERENCE; AND**
25 **ORDER (~~Proposed~~)**

26 **TO THE HONORABLE JEFFREY S. WHITE, THE DEFENDANT, AND HIS**
27 **ATTORNEY/S OF RECORD:**

28 Plaintiff J & J Sports Productions, Inc. hereby applies ex parte for an order continuing the Initial Case Management Conference in this action, presently set for Friday, January 9, 2015 at 11:00 A.M. to a new date approximately thirty (30) to forty-five (45) days forward. This request is necessitated by the fact that Plaintiff's counsel has recently perfected service on defendant Jesus Segura Cervantes a/k/a Jesus Segura. A true and correct copy of the Proof of Service have been filed with this Honorable Court, as docket entry 10.

As such, as of this writing, Plaintiff has yet to receive an answer or any other responsive 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 case itself or the preparation of a Joint Case Management Conference Statement.

PLAINTIFF'S EX PARTE APPLICATION FOR AN ORDER CONTINUING
THE INITIAL CASE MANAGEMENT CONFERENCE; AND ORDER (~~Proposed~~)
CASE NO. 4:14-cv-03954-JSW
PAGE 1

1 **PROOF OF SERVICE (SERVICE BY MAIL)**

2
3 I declare that:

4
5 I am employed in the County of Los Angeles, California. I am over the age of eighteen years
6 and not a party to the within cause; my business address is 1114 Fremont Avenue, South Pasadena,
7 California 91030. I am readily familiar with this law firm's practice for collection and processing of
8 correspondence/documents for mail in the ordinary course of business.

9
10 On December 31, 2014, I caused to serve the following documents entitled:

11 **PLAINTIFF'S EX PARTE APPLICATION FOR AN ORDER CONTINUING THE**
12 **INITIAL CASE MANAGEMENT CONFERENCE**

13 On all parties in said cause by enclosing a true copy thereof in a sealed envelope with postage
14 prepaid and following ordinary business practices, said envelope was addressed to:

15 Jesus Segura Cervantes a/k/a Jesus Segura (Defendant)
16 1049 23rd Street
17 Richmond, CA 94804

18 The fully sealed envelope with pre-paid postage was thereafter placed in our law firm's
19 outbound mail receptacle in order that this particular piece of mail could be taken to the United States
20 Post Office in South Pasadena, California later this day by myself (or by another administrative
21 assistant duly employed by our law firm).

22 I declare under the penalty of perjury pursuant to the laws of the United States that the
23 foregoing is true and correct, and that this declaration was executed on December 31, 2014, at South
24 Pasadena, California.

25
26
27 Dated: December 31, 2014

/s/ Vanessa Morales

VANESSA MORALES