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1 2	CHARLES D. COCHRAN, Esq. [State Bar No. 9 RACHAEL ERICKSON, Esq. [State Bar No. 217 KORNBLUM, COCHRAN, ERICKSON & HAR	/445]
3	50 Old Courthouse Square, Suite 601 Santa Rosa, CA 95404	
4	(707) 544-9006 - Telephone (707) 544-7213 - Facsimile	
5	Attorneys for Plaintiff	
6	ANN DILLETT	
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9	IN THE UNITED STAT	
10	FOR THE NORTHERN DIS	STRICT OF CALIFORNIA
11	ANN DILLETT, Individually as the personal	Case No.: C 15-01697 KAW
12	representative of FRED C. DILLETT,	JOINT NOTICE REGARDING
13	Plaintiff,	SETTLEMENT AND REQUEST TO CONTINUE ALL HEARING DATES; [PROPOSED] ORDER
14		[FROFOSED] ORDER
15	FRED K. SCHRAM, et al.,	
16	Defendants.	Honorable: Kandis A. Westmore
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18	NOTICE OF SI	
19	Plaintiff ANN DILLETT, Individually as	· ·
20	DILLETT, and Defendant FREDERICK K. SCH	RAM, individually and as Trustee of the Up
21	River Family Trust, under Agreement dated 3/15/	95, (hereafter the Parties) by and through their
22	counsel of record, hereby notify the Court that the	e Parties have reached a settlement in the
22	above-entitled matter. The Parties hereby request	that the Court vacate all pending due dates and
	hearings and continue them 120 days to retain jur	isdiction over this case until Defendant can
24 25	fully perform its duties as required under the settl	ement agreement. It is estimated that Defendant
25 26	will fully perform its duties on or around April 16	oth, 2016. Upon Defendant's completion of its
26 27	duties (as mandated under the settlement agreeme	ent) and within two weeks after said
27	completion, Parties will file with this Court a not	ice of dismissal with prejudice.
28	JOINT NOTICE REGARDING SETTLEMENT AND REQUEST	T TO CONTINUE ALL HEARING DATES;

1	Respectfully Submitted,
2	Dated: January 8, 2016 KORNBLUM, COCHRAN, ERICKSON & HARBISON, LLP
3	& HARDISON, LLP
4	By:/s/ Charles D. Cochran
5	Attorneys for Plaintiff ANN DILLETT
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8	Dated: January 11, 2016 RAFF LAW, APC
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10	By:/s/ Daniel S. Raff
11	Counsel for Defendant FREDERICK K SCHRAM,
12	Individually and as Trustee of the Up River Family Trust, under Agreement dated
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	JOINT NOTICE REGARDING SETTLEMENT AND REQUEST TO CONTINUE ALL HEARING DATES; 2

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1	[PROPOSED] ORDER		
2	A Joint Notice of Settlement having been filed and good cause appearing therefore, all		
3	due dates and hearing in this matter are continued 120 days. This matter shall be scheduled for		
4	a further Case Management Conference on <u>May 17, 2016</u> .		
5	IT IS SO ORDERED.		
6	Dated: 1/14/16 Kandis Westmole		
7	Kandis A. Westmore Magistrate Judge		
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	JOINT NOTICE REGARDING SETTLEMENT AND REQUEST TO CONTINUE ALL HEARING DATES; 3		

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