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15	Email: Jay.Russell@doj.ca.gov	
16	Attorneys for Defendants Woodford, Nienhuis, Bracy, McGarvey, and Knudsen	
17		
18	IN THE UNITED STATES DIST	TRICT COURT
19	FOR THE NORTHERN DISTRICT	OF CALIFORNIA
20	SAN JOSE DIVISIO	ON .
21		
22	VIET NGO,	Case No. C 03-2210 JF
23	Plaintiff,	
24	v.	CONFERENCE STATEMENT AND [PROPOSED] CASE MANAGEMENT ORDER
25	J. S. WOODFORD, et al.,	CONTINUING CMC
26	Defendants.	Hearing: April 17, 2009
27		Time: 10:30 a.m. Courtroom: 3, 5th Floor
28		Judge: The Honorable Jeremy Fogel
	Joint Case Mgmt. Conf. Statement	Ngo v. Woodford, et al.

Ngo v. Woodford, et al. C 03-2210 JF

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The parties jointly submit this Case Management Statement and Proposed Order:

Following a settlement conference held before Magistrate Judge Elizabeth Laporte on September 17, 2008, the parties reached an agreement to fully settle this litigation. Since that date, the parties have negotiated on terms for a formal Settlement and Release Agreement. Recent discussions between the parties have resulted in a revised agreement. Despite the parties' efforts, however, this process is not complete. From March 23 through 25, 2009, counsel for Defendants Woodford, Nienhuis, Bracy, McGarvey, and Knudsen was engaged in the jury trial of *Ronald Lemas v. Jill Brown*, N.D. Cal. No. C 07-00958 SI, which caused some delay in these continuing negotiations. Nevertheless, these negotiations are nearly complete, and all parties believe that the proposed agreement will be signed and executed, and a Request for Dismissal filed by Plaintiff, within the next sixty days.

To that end, the parties request that the Court continue the Case Management Conference for an additional sixty days to allow for execution of and compliance with the proposed Settlement and Release Agreement.

Dated: April 7, 2008

Respectfully submitted,

EDMUND G. BROWN JR.

Attorney General of the State of California

DAVID S. CHANEY

Chief Assistant Attorney General

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MICHAEL W. JORGENSON

Supervising Deputy Attorney General

/s/ Jay C. Russell

JAY C. RUSSELL

Supervising Deputy Attorney General

Attorneys for Defendants Woodford, Nienhuis, Bracy, McGarvey,

and Knudsen

Joint Case Mgmt. Conf. Statement

16 appearing,		
2 3 4 CONNIE TSAI, ATTORNEY AT LAW KEVIN P. BURKE, ESQ. Attorneys for Plaintiff Mike Viet Ngo  6 7 8 EDRINGTON, SCHIRMER & MURPHY 9 /s/ Timothy P. Murphy 10 11 TIMOTHY P. MURPHY, ESQ. Attorneys for Defendant Wooten  12 13 14 CASE MANAGEMENT ORDER 15 16 17 18 18 19 Dated: April 10 , 2008.	1	SIDLEY AUSTIN LLP
CONNIE TSAI, ATTORNEY AT LAW KEVIN P. BURKE, ESQ. Attorneys for Plaintiff Mike Viet Ngo  EDRINGTON, SCHIRMER & MURPHY  Solvey Murphy  TIMOTHY P. Murphy  TIMOTHY P. MURPHY, ESQ. Attorneys for Defendant Wooten  CASE MANAGEMENT ORDER  Based upon the parties' Joint Case Management Conference Statement, and good cause appearing,  IT IS ORDERED THAT the Case Management Conference is continued to June 19, 20  10:30 a.m.  Dated: April 10 , 2008.	2	
KEVIN P. BURKE, ESQ. Attorneys for Plaintiff Mike Viet Ngo  EDRINGTON, SCHIRMER & MURPHY    Solution   Filter   Filter   Filter	3	/s/ Connie Tsai
EDRINGTON, SCHIRMER & MURPHY    Page	4	CONNIE TSAI, ATTORNEY AT LAW
EDRINGTON, SCHIRMER & MURPHY    Page	5	KEVIN P. BURKE, ESQ. Attorneys for Plaintiff Mike Viet Ngo
EDRINGTON, SCHIRMER & MURPHY    10	6	
EDRINGTON, SCHIRMER & MURPHY  /s/ Timothy P. Murphy  TIMOTHY P. MURPHY, ESQ. Attorneys for Defendant Wooten  CASE MANAGEMENT ORDER  Based upon the parties' Joint Case Management Conference Statement, and good cause appearing,  IT IS ORDERED THAT the Case Management Conference is continued to June 19, 20  10:30 a.m.  Dated: April 10 , 2008.		
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23 U.S. District Count Judge	15 16 17 18 19 20 21	Based upon the parties' Joint Case Management Conference Statement, and good cause appearing,  IT IS ORDERED THAT the Case Management Conference is continued to June 19, 2009 at 10:30 a.m.  Dated: April 10, 2008.
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