veeney							
	Case 5:06-cv-03718-JW Doo	cument 12	Filed 10/02/2006	Page 1 of 3			
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16	Attorneys for Defendants SEAN SWEENEY, IN HIS CAPACITY AS TRUSTEE OF THE ESTATE OF JAMES JOYCE, AND THE ESTATE OF JAMES						
17							
18	JOYCE						
19	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA						
20							
21							
22	CAROL LOEB SHLOSS,		Case No. C 06 .	3718 JW HRL			
23	Plaintiff,		STIPULATION [PROPOSED]	N AND ORDER TO			
24	v. SEAN SWEENEY, in his capacity as trustee of the Estate of James Joyce, and THE ESTATE OF JAMES		EXTEND TIME TO RESPOND TO COMPLAINT; MOVE CASE MANAGEMENT CONFERENCE				
25							
26	and THE ESTATE OF JAN JOYCE,	MES	Current CMC D	Pate: Oct. 23, 2006			
27	Defendants.		Requested CMC	C Date: Nov. 20, 2006			
28			Loint Descou	t to Extend Time to Respond			
			IOINT RACINGS	THE REPORT FITTLE TO RECOOND			

 Joint Request to Extend Time to Respond to Complaint, Move CMC C 06 3718 JW HRL

WHEREAS, the Complaint in the above-captioned Civil Action was filed on
 June 12, 2006;

WHEREAS, to date, the parties have sought and received three extensions of
time for Defendants to respond to the Complaint, so that the time to respond
currently is on or before September 29, 2006; and

6 WHEREAS, the parties are engaged in settlement discussions. In order to 7 continue such discussions and devote their resources to them, the parties agree, and 8 respectfully request this Court to Order, a thirty day extension of the date by which 9 the Defendants must answer, object or otherwise plead to the Complaint, up to and 10 including October 30, 2006. The parties further request that the date of any event 11 or deadline set by the Court in its Order Setting Initial Case Management 12 Conference and ADR Deadlines, filed on June 12, 2006, be moved as outlined 13 below.

14 IT IS HEREBY STIPULATED between the parties, by and through their
15 counsel of record, and the Court is respectfully requested to ORDER that the
16 schedule be changed to the following:

17 October 30, 2006: Last day for Defendants to answer, object or otherwise18 plead to the Complaint;

21 days before CMC: 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; and file either Stipulation to ADR Process or Notice
 of Need for ADR Phone Conference.

7 Days before CMC: Last day to complete initial disclosures or state
objection in Rule 26(f) Report, file Case Management Statement, and file
Rule 26(f) Report;

LAI-2261450v1

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	Case 5:06-cv-03718-JW	Document 12	Filed 10/02/2006	Page 3 of 3				
1	November 20, 2006, or as soon thereafter as is convenient for the Court:							
2	Initial Case Management Conference.							
2	initial Case Managemen							
4	Dated: September 29, 2	006	JONES DAY					
5	Duced. September 29, 2							
6			Bv: /s/					
7			By: /s/ Maria K. Nels	on				
8			Attorney for Defe SEAN SWEENE	ndants Y, IN HIS				
9			CAPACITY AS T	ŔUSTEE OF THE IES JOYCE, AND F JAMES JOYCE				
10			THE ESTATE OF	F JAMES JOYCE				
11	Dated: September 29, 2	006	STANFORD LAV	W SCHOOL				
12			INTERNET AND	INIC CENTER FOR SOCIETY				
13								
14			By <u>/s/</u> David S. Ol	son				
15								
16			Attorneys for Plai CAROL LOEB S	HLOSS				
17								
18 19	IT IS SO ORDERED.							
20								
20	Dated:		-	1				
22			O lake					
23		By	de, United States	District Court				
24		ľ	inge, enned States					
25								
26								
27								
28								
	LAI-2261450v1	-	2 - Joint Reques	st to Extend Time to Respond to Move CMC C 06 3718 JW HRL				