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16 Attorneys for Defendants  
 SEAN SWEENEY, IN HIS CAPACITY AS  
 17 TRUSTEE OF THE ESTATE OF JAMES  
 JOYCE, AND THE ESTATE OF JAMES  
 18 JOYCE

19 UNITED STATES DISTRICT COURT  
 20 NORTHERN DISTRICT OF CALIFORNIA

22 **CAROL LOEB SHLOSS,**

23 **Plaintiff,**

24 **v.**

25 **SEAN SWEENEY, in his capacity as**  
**trustee of the Estate of James Joyce,**  
 26 **and THE ESTATE OF JAMES**  
**JOYCE,**

27 **Defendants.**  
 28

**Case No. C 06 3718 JW HRL**

**STIPULATION AND**  
~~**[PROPOSED]**~~ **ORDER TO**  
**EXTEND TIME TO RESPOND**  
**TO COMPLAINT; MOVE CASE**  
**MANAGEMENT**  
**CONFERENCE**

Current CMC Date: Oct. 23, 2006  
 Requested CMC Date: Nov. 20,  
 2006

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

3 WHEREAS, to date, the parties have sought and received three extensions of  
4 time for Defendants to respond to the Complaint, so that the time to respond  
5 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 otherwise  
18 plead to the Complaint;

19 21 days before CMC: Last Day to Meet and Confer re: initial disclosures,  
20 early settlement, ADR process selection, and discovery plan; file ADR Certification  
21 signed by Parties and Counsel; and file either Stipulation to ADR Process or Notice  
22 of Need for ADR Phone Conference.

23 7 Days before CMC: Last day to complete initial disclosures or state  
24 objection in Rule 26(f) Report, file Case Management Statement, and file  
25 Rule 26(f) Report;

