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 14 **IN THE UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
 15 **SAN JOSE DIVISION**

16 CRIS JAO BRETANA, on behalf of himself  
 17 and all others similarly situated,

Case No. C07-05934-JF-HRL

18 Plaintiff,

**PLAINTIFF'S FURTHER CASE  
 MANAGEMENT STATEMENT AND  
 REQUEST TO CONTINUE CASE  
 MANAGEMENT CONFERENCE AND  
 [PROPOSED] ORDER**

19 v.

20 INTERNATIONAL COLLECTION  
 CORPORATION, a California corporation,  
 21 and CHARLES D. HENDRICKSON,  
 individually and in his official capacity,  
 22 LUIGI CIOPPA, individually and in his  
 official capacity, and FRANKLIN JAY  
 23 LOVE, individually and in his official  
 capacity,

24 Defendants.  
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26 The initial case management conference in this matter was held on May 2, 2008.  
 27 Subsequently, Plaintiff propounded written discovery to Defendants. Defendants responded with  
 28 boilerplate objections and failed to produce any documents. After meeting and conferring with

1 Defendant's counsel, Plaintiff was ultimately forced to file a Motion to Compel Discovery  
2 Responses, which was granted in whole.

3 On September 22, 2008, Judge Lloyd entered an Order requiring Defendants to supplement  
4 their written discovery responses and produce all documents responsive to Plaintiff's discovery  
5 requests no later than October 3, 2008. Once Defendants have supplemented their discovery  
6 responses and produced the appropriate documents, Plaintiff intends to notice the depositions of  
7 several Defendants to take place in November.

8 Additionally, the parties attended a mediation session with Carol Webster Millie on  
9 September 22, 2008. Unfortunately the parties were unable to settle this matter.

10 In light of the foregoing and the ongoing discovery in this case, Plaintiff respectfully requests  
11 that the Case Management Conference currently set for October 3, 2008, at 10:30 a.m., be continued  
12 for sixty days.

13  
14 Dated: October 1, 2008

/s/ Raeon R. Roulston  
Raeon R. Roulston, Esq.  
Attorney for Plaintiff  
CRIS JAO BRETANA

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17  
18 **[PROPOSED] ORDER**

19 Having considered the Plaintiff's Request to Continue Case Management Conference, the  
20 request is GRANTED. A Case Management Conference shall be held on 12/5/08,  
21 at 10:30 a.m. in Courtroom 3.

22  
23 Dated: 10/2/08

  
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Honorable Jeremy Fogel  
United States District Judge