

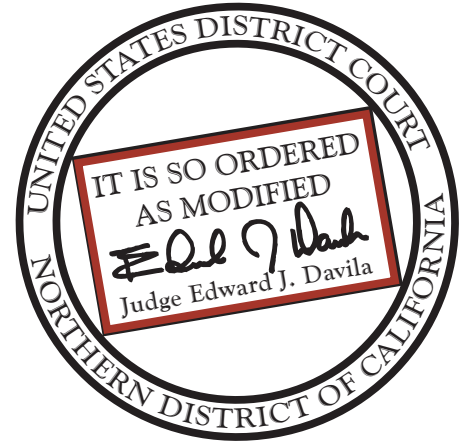
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5 Attorney for Plaintiff JENS ERIK SORENSEN,  
 6 as Trustee of SORENSEN RESEARCH  
 AND DEVELOPMENT TRUST

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15 Attorneys for Defendant LEXAR MEDIA, INC.



16 UNITED STATES DISTRICT COURT  
 17 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 18 SAN JOSE DIVISION

19 JENS ERIK SORENSEN, as Trustee of	) Case No. 08cv00095 EJD
20 SORENSEN RESEARCH AND	)
21 DEVELOPMENT TRUST,	) <b>STIPULATION TO CONTINUE CASE</b>
	) <b>MANAGEMENT CONFERENCE BY</b>
22 Plaintiff	) <b>ONE WEEK &amp; ORDER THEREON</b>
23 v.	)
	) Date: November 4, 2011
24 LEXAR MEDIA, INC., a Delaware	) Time: 10:00 a.m.
25 corporation; and DOES 1 – 100,	) Courtroom 1, 5 <sup>th</sup> Floor
	) Judge: The Hon. Edward J. Davila
26 Defendants.	)
	)
27 _____	)
28 and related counterclaims.	)
	)

1 Plaintiff Jens Erik Sorensen, as Trustee of Sorensen Research and  
2 Development Trust (“Plaintiff”) is requesting a one-week continuance of the Case  
3 Management Conference scheduled for October 28, 2011 at 10:00 a.m. (see Doc.  
4 #179) for the following reasons:

5 1. Plaintiff’s counsel, Ms. Kramer, will be out-of-state for a preplanned  
6 and unchangeable commitment from October 28-31, 2011;

7 2. Counsel who will shortly be entering her appearance as additional  
8 counsel for Plaintiff, Patricia Shackelford, and was scheduled to appear on October  
9 28th, has not yet had her admission to the Northern District processed and therefore  
10 cannot yet enter her appearance in the case.

11 Defendant Lexar Media, Inc. (“Defendant”) is amenable to this scheduling  
12 change and hereby stipulates to the requested continuance.

13  
14 RESPECTFULLY SUBMITTED this Tuesday, October 18, 2011,

15  
16 I, Melody Kramer, attest that concurrence in the filing of the document has  
17 been obtained from each of the signatories below, which shall serve in lieu of their  
18 signatures on the document.

19  
20 JENS ERIK SORENSEN, as Trustee of SORENSEN  
21 RESEARCH AND DEVELOPMENT TRUST,  
22 Plaintiff

23 /s/ Melody A. Kramer  
24 MELODY A. KRAMER, SBN 169984  
25 9930 Mesa Rim Road, Suite 1600  
26 San Diego, California 92121  
27 Telephone (858) 362-3150

28 LEXAR MEDIA, INC., Defendant

/s/ Jared Bobrow  
JARED BOBROW, SBN 133712

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8 Houston, TX 77008  
9 Telephone: (512) 546-5000

10 **ORDER**

11 Good cause appearing therefore, the parties stipulation is GRANTED. The Case  
12 Management Conference currently scheduled for October 28, 2011, is **VACATED** and re-  
13 scheduled for **November 4, 2011, at 10:00 a.m.** The parties shall file a Joint Case  
14 Management Statement on or before **October 28, 2011.**

15 The parties are further ordered to provide a proposed order for all further requests of this  
16 nature.

17 IT IS SO ORDERED.



18 EDWARD J. DAVILA  
19 United States District Judge  
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**DECLARATION OF MELODY A. KRAMER**

I, MELODY A. KRAMER, declare:

1. I am not a party to the present action. I am over the age of eighteen. I have personal knowledge of the facts contained within the following paragraphs, and could and would competently testify thereto if called as a witness in a court of law.

2. At all times relevant herein I have been an attorney for Sorensen Research and Development Trust ("Sorensen"), Plaintiff in the above-captioned matter.

3. This declaration is made in support of the parties Stipulation to Continue Case Management Conference by One Week.

4. The requested continuance is made for the reasons set forth in the Motion above, namely,

a. I will be out-of-state for a preplanned and unchangeable commitment from October 28-31, 2011;

b. Counsel who will shortly be entering her appearance as additional counsel for Plaintiff, Patricia Shackelford, and was scheduled to appear on October 28th, has not yet had her admission to the Northern District processed and therefore cannot yet enter her appearance in the case.

5. I contacted Mr. Bobrow, counsel for Defendant Lexar Media, Inc. ("Defendant"), and he indicated Defendant's willingness to agree to this scheduling change and join in a stipulation for the same.

6. Within the last year there has only been one request to modify time in this case was Plaintiff's Motion to Shorten Time for Hearing on its Motion for Immediate Lift of Stay which was granted by the Court at Doc. #173. The last prior request for time modification was in April 2010 wherein Plaintiff requested an expedited hearing date for a Motion to Reopen Case, which request was denied at Doc. #151.

1           7.       The effect of the requested time modification to this case will be minimal in  
2 that the requested continuance is only by one week. Furthermore, the time modification  
3 will allow me, as lead counsel in this case, to be present for the Case Management  
4 Conference instead of another attorney who does not have as much familiarity with the  
5 case.

6 SWORN TO UNDER PENALTY OF PERJURY on Tuesday, October 18, 2011 in San  
7 Diego, California.

8  
9                                        /s/ Melody A. Kramer

10                                       Melody A. Kramer, Esq.  
11                                       Attorney for Plaintiff

1 **PROOF OF SERVICE**

2 I, Melody A. Kramer, declare: I am and was at the time of this service working within in  
3 the County of San Diego, California. I am over the age of 18 year and not a party to the within  
4 action. My business address is the Kramer Law Office, Inc., 9930 Mesa Rim Road, Suite 1600,  
5 San Diego, California, 92121.

6 On Tuesday, October 18, 2011 I served the following documents:

7 **STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE**  
8 **BY ONE WEEK**

PERSON(S) SERVED	PARTY(IES) SERVED	METHOD OF SERVICE
Jared Bobrow Weil, Gotshal & Manges LLP 201 Redwood Shores Parkway Redwood Shores, CA 94065 jared.bobrow@weil.com	Lexar Media, Inc.	Email--Pleadings Filed with the Court via CM/ECF
Kevin Kudlac Weil, Gotshal & Manges LLP Kevin.kudlac@weil.com 700 Louisiana, Suite 1600 Houston, Texas 77002	Lexar Media, Inc.	Email--Pleadings Filed with the Court via CM/ECF

- 19
- 20  (Personal Service) I caused to be personally served in a sealed envelope hand-delivered  
21 to the office of counsel during regular business hours.
- 22  (Federal Express) I deposited or caused to be deposited today with Federal Express in a  
23 sealed envelope containing a true copy of the foregoing documents with fees fully  
24 prepaid addressed to the above noted addressee for overnight delivery.
- 25  (Facsimile) I caused a true copy of the foregoing documents to be transmitted by  
26 facsimile machine to the above noted addressees. The facsimile transmissions were  
27 reported as complete and without error.
- 28  (Email) I emailed a true copy of the foregoing documents to an email address  
represented to be the correct email address for the above noted addressee.

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(Email--Pleadings Filed with the Court) Pursuant to Local Rules, I electronically filed this document via the CM/ECF system for the United States District Court for the Southern District of California.

(U.S. Mail) I mailed a true copy of the foregoing documents to a mail address represented to be the correct mail address for the above noted addressee.

I declare that the foregoing is true and correct, and that this declaration was executed on Tuesday, October 18, 2011, in San Diego, California.

/s/ Melody A. Kramer

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Melody A. Kramer