

E-Filed 01/29/2010

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6 Attorneys for Defendant,
 7 AMERICAN RED CROSS SANTA CLARA
 VALLEY CHAPTER

8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION**

11 JASON ACOSTA,

12 Plaintiff,

13 v.

14 AMERICAN RED CROSS SANTA CLARA
 15 VALLEY CHAPTER, California nonprofit
 organization, form unknown; and
 16 DOES 1-50,

17 Defendant.

Case No. 5:09-cv-00867-RS

E-FILING

**STIPULATION AND ~~PROPOSED~~
 ORDER CONTINUING DEADLINE FOR
 HEARING DISPOSITIVE MOTIONS**

18
 19 IT IS HEREBY STIPULATED by and between Plaintiff, Jason Acosta (“Plaintiff”), and
 20 Defendant, Santa Clara Valley Chapter of the American Red Cross (“Defendant”), through their
 21 respective attorneys of record herein, as follows:

22 1. Currently, the deadline for hearing pre-trial motions in this case is March 10,
 23 2010. Defendant will file a motion for summary judgment in this case and intended to notice the
 24 motion for the Court’s Wednesday civil motion calendar on March 10, 2010.

25 2. Recently, the Court notified the parties that, effective February 15, 2010, Judge
 26 Seeborg’s civil motion calendar will be conducted on Thursdays, instead of Wednesdays.
 27 Plaintiff’s counsel is not available on Thursday, March 11, 2010, and Judge Seeborg’s calendar
 28 clerk has advised that there is no civil motion calendar the previous week. Therefore, the parties

1 respectfully request that the hearing on this motion be continued to the next civil motion calendar
2 on March 18, 2010, and that the deadline be continued accordingly.

3 DATED: January 28, 2010

WILLIAMS, PINELLI & CULLEN, LLP

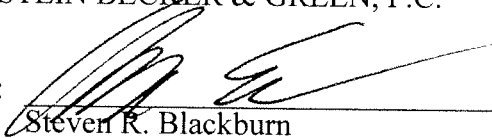
4
5 By: _____

Edward P. Cullen
Amy Carlson
Attorneys for Plaintiff
JASON ACOSTA

6
7
8 DATED: January 28, 2010

EPSTEIN BECKER & GREEN, P.C.

9
10 By: _____



Steven R. Blackburn
Andrew J. Sommer
Attorneys for Defendant
SANTA CLARA VALLEY CHAPTER OF
THE AMERICAN RED CROSS

11
12
13
14 **ORDER**

15 Pursuant to the Stipulation above, the deadline for hearing dispositive motions in this
16 case is continued to March 18, 2010.

17
18 IT IS SO ORDERED.

19 Dated: 01/28/2010


20 

The Honorable Richard Seeborg
UNITED STATES DISTRICT JUDGE

1 respectfully request that the hearing on this motion be continued to the next civil motion calendar
2 on March 18, 2010, and that the deadline be continued accordingly.

3 DATED: January 28, 2010

WILLIAMS, BINELLI & CULLEN, LLP

4 By: 
Edward P. Cullen
Amy Carlson

Attorneys for Plaintiff
5 JASON ACOSTA
6 EPSTEIN BECKER & GREEN, P.C.

7 DATED: January 28, 2010

8 By: _____
9 Steven R. Blackburn
Andrew J. Sommer
10 Attorneys for Defendant
11 SANTA CLARA VALLEY CHAPTER OF
THE AMERICAN RED CROSS

12 **ORDER**

13 Pursuant to the Stipulation above, the deadline for hearing dispositive motions in this
14 case is continued to March 18, 2010.

15 IT IS SO ORDERED.

16 Dated:

17 _____
18 The Honorable Richard Seeborg
UNITED STATES DISTRICT JUDGE