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9 **Attorneys for Plaintiff**
 10 **G & G Closed Circuit Events, LLC**

11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**
 13 **SAN JOSE DIVISION**

14 **G & G CLOSED CIRCUIT EVENTS, LLC,**

CASE NO. 5:10-cv-01415-LHK

15 **Plaintiff,**

PLAINTIFF'S *EX PARTE*
APPLICATION FOR AN ORDER
CONTINUING CASE MANAGEMENT
CONFERENCE; AND ORDER
(Proposed)

16 **v.**

17 **JOHN P. QUACH, et al.**

18 **Defendants.**

19 **TO THE HONORABLE LUCY H. KOH, THE DEFENDANT/S AND THEIR**
 20 **ATTORNEY/S OF RECORD:**

21 Plaintiff G & G Closed Circuit Events, LLC, hereby applies *ex parte* for an order continuing the
 22 Case Management Conference presently set for September 3, 2010 at 9:30 AM. As set forth below
 23 Plaintiff respectfully requests that the Court continue the Case Management Conference to a new date
 24 approximately Thirty (30) to Forty-Five (45) days forward.

25 The request for the brief continuance is necessitated by the fact that Plaintiff has not yet
 26 perfected service of the Amended Complaint upon the Defendants John P. Quach and Thien Tran
 27 a/k/a Hien Tran individually and d/b/a Am Tham, and Liem V. Ngo, individually and d/b/a Am
 28 Tham. As a result, Plaintiff's counsel has not conferred with the defendants concerning the claims,
 discovery, settlement, ADR or any of the other pertinent issues involving the case itself or the

1 preparation of a Case Management Conference Statement.

2 Plaintiff recently identified an alternative address that it believes will be successful to serve
3 its initiating suit papers, upon the Defendants.

4 **WHEREFORE**, Plaintiff respectfully requests that this Honorable Court continue the Case
5 Management Conference, presently scheduled for September 3, 2010 at 9:30 AM to a new date
6 approximately Thirty (30) to Forty-Five (45) days forward.

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Respectfully submitted,

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Dated: August 17, 2010

/s/ Thomas P. Riley

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LAW OFFICES OF THOMAS P. RILEY, P.C.

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By: Thomas P. Riley

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Attorneys for Plaintiff

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G & G Closed Circuit Events, LLC

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