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 12 **Attorneys for Defendants**
 13 **Duy Trong Nguyen, Au Thi Le,**
and Lighthouse Cafe, Inc.

14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**
 16 **SAN JOSE DIVISION**

17 **J & J SPORTS PRODUCTIONS, INC.,**

18 **Plaintiff,**

19 **v.**

20 **DUY TRONG NGUYEN, et al.,**

21 **Defendants.**

22 **CASE NO. 5:11-CV-1157-JF**

23 **SECOND STIPULATION FOR AN**
ORDER CONTINUING CASE
MANAGEMENT CONFERENCE; AND
ORDER (Proposed)- AS MODIFIED BY
THE COURT

24 **FOR: HON. JEREMY FOGEL**

25 **TO THE HONORABLE JEREMY FOGEL:**

26 By and through their counsel, Plaintiff J & J Sports Productions, Inc., and Defendants Duy
 27 Trong Nguyen and Au Thi Le, individually and d/b/a Lighthouse Cafe a/k/a Lighthouse Cafe &
 28 Restaurant, and Lighthouse Cafe, Inc., an unknown business entity d/b/a Lighthouse Cafe a/k/a
 Lighthouse Cafe & Restaurant hereby agree, stipulate, and respectfully request that this Honorable

1 Court continue the Case Management Conference presently set for September 23, 2011 at 10:30 AM.

2 The request for the brief continuance is necessitated by the fact that counsel for the Parties have
3 been engaged in settlement discussions and request additional time to conclude same.

4 **WHEREFORE, IT IS HEREBY STIPULATED BY AND RESPECTFULLY REQUESTED**
5 **BY THE PARTIES** that the Court reschedule Case Management Conference, presently scheduled for
6 September 23, 2011 at 10:30 AM to a new date approximately Thirty (30) to Forty-Five (45) days
7 forward.

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11 Respectfully Submitted,

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13 Dated: September 14, 2011

/s/ Thomas P. Riley

LAW OFFICES OF THOMAS P. RILEY

By: Thomas P. Riley

Attorneys for Plaintiff

J & J Sports Productions, Inc.

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19 Dated: September 14, 2011



ANDERSEN, ROSCHA & ODNE, LLP

By: Nicholas Roscha

Attorneys for Defendants

Duy Trong Nguyen, Au Thi Le, and

Lighthouse Cafe, Inc.

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1 **PROOF OF SERVICE (SERVICE BY E-MAIL)**

2 I declare that:

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4 I am employed in the County of Los Angeles, California. I am over the age of eighteen years
5 and not a party to the within cause; my business address is 1114 Fremont Avenue, South Pasadena,
6 California 91030. I am readily familiar with this law firm's practice for collection and processing of
7 correspondence/documents for mail in the ordinary course of business.
8

9 On September 14, 2011, I served:

10
11 **SECOND STIPULATION FOR AN ORDER CONTINUING CASE**
12 **MANAGEMENT CONFERENCE; AND ORDER (Proposed)**

13 On all parties in said cause by electronic mailing same to the Defendants' counsel at the
14 following email address(es):

15
16 Nicholas Roscha, Esquire
17 Christopher N. Odne, Esquire
18 **ANDERSEN, ROSCHA & ODNE, LLP**
19 1320 Willow Pass Road, Ste. 500
20 Concord, CA 94520
21 Email: nroscha@aro-law.com
22 codne@aro-law.com

Attorneys for Defendants
Duy Trong Nguyen, Au Thi Le, and
Lighthouse Cafe, Inc.

23 I declare under the penalty of perjury pursuant to the laws of the United States that the
24 foregoing is true and correct and that this declaration was executed on September 14, 2011, at South
25 Pasadena, California.

26 Dated: September 14, 2011

/s/ Maria Baird

MARIA BAIRD