

1 Joseph S. May SBN 245924  
 2 LAW OFFICE OF JOSEPH S. MAY  
 3 22 Battery Street, Suite 810  
 4 San Francisco, CA 94111  
 Telephone (415) 781-3333  
 Facsimile (415) 398-1410  
 joseph@josephmaylaw.com

5 Attorney for Plaintiff  
 6 MOJGAN BALOUCH

7  
 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN JOSE DIVISION

11 MOJGAN BALOUCH,

12 Plaintiff,

13 v.

14 BRYAN J. SOUZA; and DOES 1-10,  
 15 inclusive.

16 Defendants.

CASE NO.: C11-2498-LHK

**STIPULATION AND PROPOSED  
 ORDER CONTINUING CMC AND  
 HEARING ON MOTION TO BE  
 RELIEVED AS COUNSEL**

As modified

Action Filed: May 23, 2011  
 Trial Date: None set

17  
 18 **STIPULATION**

19 The Parties, through undersigned counsel, hereby stipulate and agree as follows:

20 1. The next Case Management Conference and the hearing on Plaintiff's Counsel's  
 21 Motion to Withdraw are both currently set for January 25, 2012.

22 2. Plaintiff's counsel began a jury trial in San Francisco Superior Court in a case entitled  
 23 *Hechavarria v. Georgopoulos*, Case No. CGC-10-504364, on January 3, 2012. The trial was  
 24 initially estimated to last five court days; however, the trial has been moving slowly and is now  
 25 expected to continue through the end of January 2012 and into the first week of February 2012.  
 26 The trial is conducted from 10:00 a.m. until 4:30 p.m. Mondays through Thursdays.

1 3. In light of the foregoing, the parties, through undersigned counsel, stipulate to continue  
2 the hearing on the motion to withdraw and the Case Management Conference by two weeks, to  
3 February 8, 2012, or as soon thereafter as the Court's schedule permits.

4 So Stipulated.

5 Dated: January 20, 2012

LAW OFFICE OF JOSEPH S. MAY

6 */s/ Joseph S. May*

7 JOSEPH S. MAY  
8 *Attorney for Plaintiff*

8 So Stipulated.

9 Dated: January 20, 2012

KAMALA D. HARRIS  
Attorney General of California  
TYLER B. PON  
Supervising Deputy Attorney General

12 */s/ Jeff R. Vincent\**

13 JEFF R. VINCENT  
14 *Deputy Attorney General*  
15 *Attorneys for Defendant*

16 \* Pursuant to General Order 45, §O.K., the filer  
17 of this document attests that he has received  
18 the concurrence of this signatory to file this  
19 document.

18 **PROPOSED ORDER**

19 Pursuant to the stipulation of the Parties, and good cause appearing, it is HEREBY  
20 ORDERED that the CMC and hearing on Plaintiff's counsel's motion to withdraw be continued  
21 from January 25, 2012 to February 8, 2012. The parties shall file one Joint  
22 SO ORDERED. Case Management Statement one week before the case  
23 management conference.

24 DATED: January 23, 2012

25 *Lucy H. Koh*  
26 HON. LUCY H. KOH  
27 United States District Judge