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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

MOJGAN BALOUCH,

CASE NO.: C11-2498-LHK

Plaintiff,

v.

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

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

Defendants.

As modified

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

STIPULATION

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

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

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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

9 So Stipulated.

10 Dated: January 20, 2012

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

14 */s/ Jeff R. Vincent**

15 JEFF R. VINCENT
16 Deputy Attorney General
17 Attorneys for Defendant

18 * Pursuant to General Order 45, §O.K., the filer
19 of this document attests that he has received
20 the concurrence of this signatory to file this
21 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 
26 HON. LUCY H. KOH
27 United States District Judge