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5 Attorneys for Plaintiff, Mahsa Afsharpour

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 8 **UNITED STATES DISTRICT COURT**  
 9 **NORTHERN DISTRICT OF CALIFORNIA**

10 MAHSA AFSHARPOUR, an individual,	)	<b>CASE NO: CV11-04656-LHK</b>
	)	
11 PLAINTIFF,	)	<b>STIPULATION AND [PROPOSED]</b>
	)	<b>ORDER TO CONTINUE CASE</b>
12 v.	)	<b>MANAGEMENT CONFERENCE</b>
	)	
13 AT&T MOBILITY SERVICES LLC, a	)	<b>Date:</b> January 4, 2012
Delaware Limited Liability Company; and	)	<b>Time:</b> 2:00 p.m.
14 DOES 1-100, jointly and severally,	)	<b>Dept.:</b> Courtroom 8
	)	<b>Judge:</b> Honorable Lucy H. Koh
15 DEFENDANTS.	)	<b>As Modified by the Court</b>
_____	)	

17 Pursuant to the Court’s October 6, 2011 Order, a Case Management Conference in the above  
 18 referenced matter was scheduled for January 4, 2012. The Order further required the parties to file  
 19 a case management statement no later than seven (7) days prior to the Case Management  
 20 Conference. For the reasons set forth below, Plaintiff respectfully requests that the Court continue  
 21 the Case Management Conference scheduled for January 4, 2012 to March 16, 2012, at 2:00 p.m.

22 On October 6, 2011, counsel for AT&T Mobility Services LLC (“AT&T Mobility”) advised  
 23 Plaintiff’s counsel that none of the four Defendants named in the Complaint were proper parties to  
 24 this case, and further advised that, based on the allegations of the Complaint, the only entity which  
 25 should have been named as a Defendant was his client, AT&T Mobility. In reliance on those  
 26 representations, Plaintiff filed a First Amended Complaint on October 25, 2011, which removed  
 27 all prior Defendants, and named the new, current, Defendant AT&T Mobility. Said Defendant was  
 28 subsequently served on November 4, 2011 via Waiver of Service of Summons. On November 15,

1 2011 Plaintiff received the signed Waiver of Service from Defendant and filed the Proof of Service  
2 with the Court. Defendant's answer to the complaint is due on January 3, 2012, and Plaintiff does  
3 not anticipate the Defendant will appear until that date.

4 Given that the new Defendant has not yet appeared, is not obligated to appear, and will not  
5 appear prior to January 3, 2012, Plaintiff does not believe there to be sufficient time to Meet and  
6 Confer, and prepare and submit the Case Management Statement to the Court prior to the date of  
7 the conference. Accordingly, Plaintiff believes that continuing the Case Management Conference  
8 until March 16, 2012, would provide both parties ample and reasonable time to Meet and Confer  
9 and prepare the Case Management Statement.

10 NOW, THEREFORE, subject to the Court's approval, Plaintiff, by and through her counsel  
11 of record, respectfully asks the following:

- 12 1. That the Case Management Conference be continued from January 4, 2012, at 2:00  
13 p.m., to March 16, 2012, at 2:00 a.m.; and
- 14 2. That the corresponding deadline to file the Case Management Statement be continued  
15 to March 9, 2012.

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18 **GREEN BRYANT & FRENCH, LLP**

19 Dated: December 1, 2011

/s/ Joel R. Bryant  
\_\_\_\_\_  
Joel R. Bryant, Esq.  
Jbryant@gbflawyers.com  
Attorney for Plaintiff  
MAHSA AFSHARPOUR

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28 **ORDER**

1           **IT IS ORDERED THAT:**

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3           1.       The Case Management Conference is continued from January 4, 2012, at 2:00 p.m.,  
4 to January 25, 2012, at 2:00 p.m.; and

5           2.       The deadline to file the Joint Case Management Statement is continued from  
6 December 28, 2011, to January 18, 2012.

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8  
9 Dated: December 13, 2011

*Lucy H. Koh*

Lucy H. Koh  
United States District Judge

