Garcia v. Dalton et al Doc. 11 WOOD, SMITH, HENNING & BERMAN LLP Attomeys at Law 1401 WILLOW PASS ROAD, SUITE 700 CONCORD, CALIFORNIA 94520-7982 TELEPHONE 925 222 3400 LEGAL:10304-0001/2817447.1 LEGAL:10304-0001/2817447.1 -1STIPULATION AND REQUEST TO CHANGE HEARING DATE PURSUANT TO CIVIL LOCAL RULES 6-2
AND 7-7 Dockets.Justia.com 

## **EXHIBIT A**

1 Steven H. Schultz, Esq., SBN 163543 Law Office of Steven H. Schultz 701 Howe Avenue, Suite A3 3 Sacramento, CA 95825 Telephone: (916)922-23104 Facsimile: (916) 922-1921 5 6 UNITED STATES DISTRICT COURT 7 NORTHERN DISTRICT OF CALIFORNIA 8 9 Case No.: 5:13-cv-04849-HRL 10 RACHEL GARCIA, 11 STIPULATION BETWEEN PARTIES Plaintiff, TO CONTINUE DEFENDANT'S 12 MOTION TO CHANGE VENUE PURSUANT TO 28 U.S.C. VS. 13 1404(a) 14 THE LAW ANDREA DALTON; OFFICE OF ANDREA DALTON, DAVID WOODRUFF; HILLYARD, WAHLBERG, KUDLA & SLOANE, LLP; ANAPOL SCHWARTZ; and DOES 1 16 17 through 100, inclusive, 18 Defendant 19 20 21 Pursuant to Federal Rule of Civil Procedure , 22 the parties and each of them hereby stipulate to 23 continue defendant's ANDREA DALTON and THE LAW OFFICE 24 25 of ANDREA DALTON, LLC's Motion to Change Venue Pursuant 26 to 28 U.S.C. 1404 (a) because of the following: 27 28 Plaintiff's counsel has surgery scheduled on STIPULATION BETWEEN PARTIES TO CONTINUE DEFENDANT'S MOTION TO CHANGE VENUE PUPSUANT TO 28 U.S.C. 1404(a) - 1

December 5, 2013; Thanksgiving holiday; pre-operative appointment; depositions/meetings previously scheduled and a pre-paid vacation on the date of the hearing, December 31, 2013.

2. Parties thereby agree and stipulate that this hearing be moved to January 14, 2014 or a date after that at the convenience of the Court.

It is hereby stipulated.

Dated: 1/15/13

STEVEN H. SCHULTZ Attorney for Plaintiff

Dated: 11-26-2013

DENNIS POLK

Attorney for Defendant

1 2 3 4 5	Steven H. Schultz, Esq., SBN 163543 Law Office of Steven H. Schultz 701 Howe Avenue, Suite A3 Sacramento, CA 95825 Telephone: (916)922-2310 Facsimile: (916)922-1921	
6	UNITED STATES DISTRICT COURT	
7	NORTHERN DISTRICT OF CALIFORNIA	
8	NONTHBIAN BIBLINICI OF CHBILORNIA	
9		
10	RACHEL GARCIA,	Case No.: 5:13-cv-04849-HRL
12	Plaintiff,	[Proposed] ORDER GRANTING PARTIES MOTION TO CONTINUE
13	vs.	DEFENDANT'S MOTION TO CHANGE VENUE PURSUANT TO 28
14	ANDREA DALTON; THE LAW	U.S.C. 1404(a)
15	,	Honorable Howard R. Lloyd
16	OFFICE OF ANDREA DALTON,	
17	LLC; DAVID WOODRUFF;	
18	HILLYARD, WAHLBERG, KUDLA &	
19	CLOANE LID. ANADOL	
20	SLOANE, LLP; ANAPOL	
21	SCHWARTZ; and DOES 1	3
22	through 100, inclusive,	
24	Defendant	
25	Detendant	
26		
27		
28		

Pursuant to the parties' written "Stipulation to

Continue Defendant's Motion to Change Venue", a true

and correct copy of which is attached hereto as Exhibit

A and is hereby incorporated herein by this reference:

IT IS HEREBY ORDERED THAT:

The Parties Stipulation to Continue Defendant's

Motion to Change Venue Pursuant to 28 U.S.C. 1404(a) is granted with the new date of January 14, 2014 for that motion to be heard. Opposition papers are due on December 19, 2013 and Reply papers are due on December 31, 2013

Dated: 12/6/13

The Honorable Howard R. Lloyd