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Attorneys for Defendant
 ANHEUSER-BUSCH, INC.

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF CALIFORNIA

)	
UNITED BRANDS COMPANY, INC.,)	Case No. 10-CV-2281-AJB (WMc)
)	
Plaintiff,)	Hon. Anthony J. Battaglia
)	Courtroom A
v.)	
)	Magistrate Judge William McCurine, Jr.
)	
ANHEUSER-BUSCH, INC.,)	JOINT MOTION TO EXTEND RULE 26
)	COMPLIANCE AND CASE
Defendant.)	MANAGEMENT CONFERENCE
)	DEADLINES
)	

Plaintiff United Brands Company, Inc. ("UBC") and Defendant Anheuser-Busch, Inc. ("A-B") file this Joint Motion to Extend Rule 26 Compliance and Case Management Conference deadlines due to the appearance of new counsel for A-B and the need to complete the transition to new counsel through the upcoming holiday season.

Pursuant to the November 28, 2011 Order setting Rule 26 compliance and case management conference deadlines (Dkt. 49), and as set forth in the table below, the parties have upcoming deadlines to lodge a discovery plan, serve initial disclosures, and appear for a Settlement/Case Management Conference.

For the reasons explained below, A-B proposes, and UBC is amenable to, a new schedule as follows:

<i>Event</i>	<i>Current Dates</i>	<i>Proposed Dates</i>
Complete Rule 26(f) Conference	December 22, 2011	January 27, 2012
Lodge Discovery Plan	January 9, 2012	February 3, 2012
Serve Initial Disclosures pursuant to Rule 26(a)(1)(A-D)	January 13, 2012	February 6, 2012
Settlement/Case Management Conference before Magistrate Judge McCurine, Jr.	January 20, 2012	February 10, 2012 ¹

A-B just retained new counsel in this matter, Pillsbury Winthrop Shaw Pittman LLP. The Pillsbury attorneys do not yet have access to former counsel's records, which are in the process of being transferred. A-B's new counsel requires time to review and have a meaningful opportunity to prepare a discovery plan and initial disclosures, and to prepare for the settlement/case management conference. *See* Declaration of Bobby Ghajar in Support of Joint Motion to Extend Rule 26 Compliance and Case Management Deadlines ("Ghajar Decl."), ¶2. The need for an extension is heightened because of the forthcoming holiday season, including the unavailability of A-B employees because A-B's office are closed until January 4, 2012. *Id.* at ¶3. Thus, as proposed above, the parties believe there

¹ In the event the Court is unavailable for the Case Management Conference on February 10, due to pending pretrial obligations, a pretrial conference, and a two week jury trial in the Central District of California for which the undersigned is lead counsel, A-B's counsel would be unavailable for a Case Management Conference until March 19, 2011 because of conflicts with that case. *Id.* at ¶4-5.

1 is good cause for an approximate three-week continuance of the 26(f) conference, discovery
2 plan, initial disclosure dates, and Case Management Conference.

3 The parties submit that they have been diligent in taking all steps necessary to
4 comply with the Court's deadlines.

5
6 DATED: December 23, 2011

7 Respectfully submitted,
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CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2011, I served the above Joint Motion to
Extend Rule 26 Compliance and Case Management Conference Deadlines via the Court's
ECF system to:

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I declare that I am employed by a member of the bar of this Court, at whose
direction this service was made.

Dated: December 23, 2011

/s/ Bobby A. Ghajar