

1 Daniel G. Lamb (SBN 101685)
 2 Daniel.lamb@pillsburylaw.com
 3 PILLSBURY WINTHROP SHAW PITTMAN LLP
 4 502 West Broadway, Suite 1100
 5 San Diego, CA 92101-3575
 6 Telephone: (619) 234-5000
 7 Facsimile: (619) 236-1995

8 Richard H. Zaitlen (SBN 63283)
 9 Richard.zaitlen@pillsburylaw.com
 10 Bobby A. Ghajar (SBN 198719)
 11 Bobby.ghajar@pillsburylaw.com
 12 Marcus D. Peterson (SBN 265339)
 13 Marcus.peterson@pillsburylaw.com
 14 PILLSBURY WINTHROP SHAW PITTMAN LLP
 15 725 South Figueroa Street, Suite 2800
 16 Los Angeles, CA 90017-5406
 17 Telephone: (213) 488-7100
 18 Facsimile: (213) 629-1033
 19 Attorneys for Defendant
 20 ANHEUSER-BUSCH, INC.

21 UNITED STATES DISTRICT COURT
 22 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.,)	DECLARATION OF BOBBY GHAJAR
)	IN SUPPORT OF JOINT MOTION TO
Defendant.)	EXTEND RULE 26 COMPLIANCE AND
)	CASE MANAGEMENT CONFERENCE
)	DEADLINES

23
 24 I, Bobby A. Ghajar, declare as follows:

25 1. I am an attorney licensed to practice in the State of California and a partner
 26 with the law firm of Pillsbury Winthrop Shaw Pittman LLP, representing Defendant
 27 Anheuser-Busch, Inc. The matters stated below are of my own personal knowledge. If
 28

1 called as a witness, I could and would testify competently thereto. I make this Declaration
2 in support of the Joint Motion to Extend Rule 26 Compliance and Case Management
3 Conference Deadlines.

4 2. My firm has been retained by Anheuser-Busch, Inc. (“A-B”) to assume
5 responsibility of this matter and we are substituting into this case. The case documents that
6 are in the possession of former counsel are in the process of being transferred. My team
7 needs a reasonable opportunity to review those files and confer with the client to put
8 together a discovery plan and to comply with the initial disclosure requirement.

9 3. A-B’s office are closed for the holidays until January 4, 2012.

10 4. In the even the Court is unable to accommodate a February 10, 2012 Case
11 Management Conference, we ask the Court to move the conference to March 19, 2012 or
12 the next available date thereafter. Unfortunately, this postponement is necessary due to pre-
13 existing, conflicting pretrial and trial obligations is another case. I currently have a two-
14 week jury trial schedule before Judge Collins in the Central District of California beginning
15 at the end of February. The final pretrial conference is February 13, 2012 and there are a
16 number of deadlines between that date and trial. I am lead trial counsel in that case. The
17 trial is expected to run two weeks, although Judge Collins has advised the parties that she
18 may need to shorten the trial weeks to accommodate her Chief Judge duties.

19 5. Moreover, I am informed that the client representative would be unable to
20 participate in any ENE during the week of February 22, 2012. I appreciate the Court’s
21 consideration of my desire to avoid a conflict with the re-scheduled Case Management
22 Conference in this case.

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I declare under penalty of perjury under the laws of the United States of America
that the foregoing is true and correct.

Executed at Los Angeles, California, this 23rd of December, 2011.

Respectfully submitted,
DANIEL G. LAMB, JR
San Diego Office
501 West Broadway, Suite 1100
San Diego, CA 92101

RICHARD H. ZAITLEN
BOBBY A. GHAJAR
MARCUS D. PETERSON
Los Angeles Office
725 South Figueroa Street, Suite 2800
Los Angeles, CA 90017-5406

By /s/ Bobby A. Ghajar
Attorneys for Defendant
ANHEUSER-BUSCH, INC.

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CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2011, I served the above Declaration of Bobby Ghajar in Support of Joint Motion to Extend Rule 26 Compliance and Case Management Conference Deadlines via the Court’s ECF system to:

Nancy O. Dix
Brian L. Behmer
Cristina D. Yates
Christopher J. Beal
DLA PIPER LLP (US)
401 B Street, Suite 1700
San Diego, CA 92101-4297
Telephone: (619) 699-2700
Fax: (619) 699-2701

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