

R. Scott Jerger (*pro hac vice*) (Oregon State Bar #02337)
Field Jerger LLP
621 SW Morrison, Suite 1225
Portland, OR 97205
Tel: (503) 228-9115
Fax: (503) 225-0276
Email: scott@fieldjerger.com

John C. Gorman (CA State Bar #91515)
Gorman & Miller, P.C.
210 N 4th Street, Suite 200
San Jose, CA 95112
Tel: (408) 297-2222
Fax: (408) 297-2224
Email: jgorman@gormanmiller.com

Attorneys for Defendants
Matthew Katzer and Kamind Associates, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ROBERT JACOBSEN, an individual,)	Case Number C06-1905-JSW-JL
)	Hearing Date: August 21, 2009
Plaintiff,)	Hearing Time: 1:30pm
)	Place: Ct. F, Floor 15
vs.)	Hon. Judge Larson
)	
MATTHEW KATZER, an individual, and)	DEFENDANTS MATTHEW
KAMIND ASSOCIATES, INC., an Oregon)	KATZER AND KAMIND
corporation dba KAM Industries,)	ASSOCIATES, INC.'S
)	MEMORANDUM IN RESPONSE
Defendants.)	TO PLAINTIFF'S
)	ADMINISTRATIVE MOTION FOR
)	A STATUS CONFERENCE

Defendants Matthew Katzer and Kamind Associates, Inc. (Defendants) hereby briefly respond to Plaintiff's Administrative Motion for a Status Conference.

///

1
2 Defendants agree that it behooves both parties to alter the discovery deadlines,
3 particularly the fact discovery cut-off deadline of October 5, 2009. Defendants do not believe, as
4 Plaintiff suggests, that the “parties can adjust the discovery deadline between themselves.”
5 Rather, defendants believe that plaintiffs and defendants should confer together amicably on
6 adjusting the deadlines with the goal of submitting a proposed, stipulated order to the Court, in
7 order to save this Court’s valuable time and resources. That was the point of “Exhibit A” to
8 Plaintiff’s motion.
9

10 **Conclusion**

11 Defendants believe a status conference is unnecessary and that the parties should work
12 together to present a proposed, stipulated order to this Court with modifications to the discovery
13 schedule.
14

15 Dated August 5, 2009.

16 Respectfully submitted,

17 /s/ Scott Jerger

18 R. Scott Jerger (*pro hac vice*)
19 Field Jerger LLP
20 621 SW Morrison, Suite 1225
21 Portland, OR 97205
22 Tel: (503) 228-9115
23 Fax: (503) 225-0276
24 Email: scott@fieldjerger.com
25
26

CERTIFICATE OF SERVICE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

I certify that on August 5, 2009, I served Matthew Katzer's and KAM's RESPONSE TO PLAINTIFF'S MOTION FOR A STATUS CONFERENCE on the following parties through their attorneys via the Court's ECF filing system:

Victoria K. Hall
Attorney for Robert Jacobsen
Law Office of Victoria K. Hall
3 Bethesda Metro Suite 700
Bethesda, MD 20814

David McGowan
Warren Hall
5998 Alcala Park
San Diego, CA 92110

/s/ Scott Jerger
R. Scott Jerger (*pro hac vice*)
Field Jerger LLP