1 2 3 4	VICTORIA K. HALL (SBN 240702) LAW OFFICE OF VICTORIA K. HALL 401 N. Washington St. Suite 550 Rockville MD 20850 Victoria@vkhall-law.com Telephone: 301-738-7677 Facsimile: 240-536-9142		
5	Attorney for Plaintiff		
6	ROBERT JACOBSEN		
7			
8			
9			
10	UNITED STATES DISTRICT COURT		
11	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
12	SAN FRANCISCO DIVISION		
13	ROBERT JACOBSEN,) No. C-06-1905-JSW	
14	Plaintiff,	OPPOSITION TO ADMINISTRATIVE	
15	V.	MOTION TO CONTINUE DATES SET FOR ADR AND RULE 26(F)	
16	MATTHEW KATZER, et al.,	DISCLOSURE	
17	Defendants.	Courtroom: 2, 17th Floor Judge: Hon. Jeffrey S. White	
18	Defendants.) Judge. From Jerricy 5. Write	
19			
20			
21			
22	Plaintiff Robert Jacobsen, through his undersigned counsel, opposes Defendants' request to		
23	continue dates for ADR and Rule 26(f) disclosures set by the Court's Order Setting Initial Case		
24	Management Conference and ADR Deadlines.		
25			
26			
27			
28	2. Plaintiff's counsel and Defendants' counsels had been working together to arrange noticing -1- No. C-06-1905-ISW OPPOSITION TO ADMINISTRATIVE MOTION TO CONTINUE DATES SET		

of motions which would fit in opposing counsel's schedules. 1 3. In light of this, Plaintiff's counsel – although under no duty to do so – notified Defendants' 2 3 counsels that she may file a motion, or motions, and notice them for August 4 or 11 (not Aug. 11 only as asserted by Mr. Zeff). Zeff Decl. Ex. 2. 4 4. Defendant Russell's counsel assumed that Plaintiff's counsel intended to amend the complaint to remove Counts 5 and/or 7 in light of his and Defendant Katzer/KAMIND 6 Associates' anti-SLAPP motions. Zeff Decl. Ex. 2. 5. As Plaintiff's counsel's response indicates, this is incorrect. No amendment will be made to 9 remove either Count 5 or Count 7, or for that matter, to drop Defendant Russell from the complaint. See Zeff Decl. Ex. 1. 10 6. If the potential for amendments to the complaint, or the filing of motions, were to delay the 11 12 "meet and confer" and Rule 26(f) disclosures, then these deadlines could conceivably be extended for months over the assertion that a potential amendment or motion could be 13 14 made. 15 7. The only reason to continue the "meet and confer" and Rule 26(f) disclosures would be if 16 the Court considers these actions to be discovery to be deferred by the anti-SLAPP statute. 17 Only in this case, Plaintiff agrees to continue the dates as to Defendant Russell, but not as 18 to Defendants Katzer and KAMIND Associates. 19 20 For these reasons, the Administrative Motion to Continue Dates Set for ADR and Rule 21 26(f) Disclosure should be denied. 22 /// 23 /// 24 /// 25 /// 26 /// 27 /// 28 ///

1	
2	
3	DATED: May 22, 2006
4	
5	By /s/ Victoria K. Hall, Esq. (SBN.240702) LAW OFFICE OF VICTORIA K. HALL 401 N. Washington St. Suite 550 Rockville MD 20850
6	LAW OFFICE OF VICTORIA K. HALL 401 N. Washington St. Suite 550
7	
8	Telephone: 301-738-7677 Facsimile: 240-536-9142
9	ATTORNEY FOR PLAINTIFF
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
	No. C-06-1905-JSW OPPOSITION TO ADMINISTRATIVE MOTION TO CONTINUE DATES SET
	FOR ADR AND RULE 26(F) DISCLOSURE

Case 3:06-cv-01905-JSW Document 40-1 Filed 05/22/2006 Page 3 of 3