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### FILED Superior Court of California County of Los Angeles 02/22/2021

Sherri R. Carter, Executive Officer / Clerk of Court K. Metover

## SUPERIOR COURT OF THE STATE OF CALIFORNIA

corporation; MJJ VENTURES, INC., a California corporation; and DOES 4-50, inclusive,

Defendants.

Case No. BC 508502 [Related to Case No. BP117321 and Case No. BC545264]

Assigned to the Hon. Mark A. Young, Department M (Santa Monica)

JOINT STIPULATION AND PROPOSED ORDER RESCHEDULING HEARING ON **DEFENDANTS' MOTION FOR** SUMMARY JUDGMENT OR ADJUDICATION

Action Filed: May 10, 2013 Trial Date: June 14, 2021

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#### **JOINT STIPULATION**

WHEREAS, Defendants MJJ Productions, Inc. and MJJ Ventures, Inc. ("Defendants") filed a Motion for Summary Judgment or, in the Alternative, Summary Adjudication of Issues (the "Motion") on December 7, 2020;

WHEREAS the reserved hearing date was originally May 4, 2021, but was advanced to February 24, 2021 by order of the Court dated December 4, 2020;

WHEREAS Plaintiff Wade Robson filed an Opposition to the Motion on February 10, 2021, and Defendants filed a reply on February 19, 2021;

WHEREAS the parties have agreed to reschedule the hearing because the attorney arguing the Motion for Defendants is unavailable to appear for the hearing on February 24, 2021 due to a death in his immediate family;

WHEREAS counsel for Defendants contacted Department M on February 19, 2021 and was advised that the next available hearing date is April 20, 2021;

IT IS HEREBY STIPULATED, agreed, and requested that the hearing on Defendants' Motion, which is currently scheduled for February 24, 2021, be rescheduled to April 20, 2021 at 8:30 a.m. in Department M.

IT IS SO STIPULATED.

DATED: February 22, 2021 MANLY, STEWART & FINALDI

By: /s/ Vince W. Finaldi

Vince W. Finaldi 21

Attorneys for Plaintiff Wade Robson

DATED: February 22, 2021 KINSELLA WEITZMAN ISER KUMP LLP

By: /s/ Katherine T. Kleindienst

25 Katherine T. Kleindienst Attorneys for Defendants 26

MJJ Ventures, Inc. and MJJ Productions, Inc. 27

# KINSELLA WEITZMAN ISER KUMP LLP 808 WILSHIRE BOULEVARD, 3<sup>RD</sup> FLOOR SANTA MONICA, CALIFORNIA 90401 TEL 310.566.9800 • FAX 310.566.9850

#### **ORDER**

The Court, having considered the foregoing Stipulation of the parties, and good cause appearing therefor,

IT IS SO ORDERED.

DATED: \_\_\_\_\_\_,2021

By: Hon Mark A V

Los Angeles Superior Court Judge

10386-00226/727159.1

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#### **PROOF OF SERVICE**

#### STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 808 Wilshire Boulevard, 3rd Floor, Santa Monica, CA 90401.

On February 22, 2021, I served true copies of the following document(s) described as JOINT STIPULATION AND [PROPOSED] ORDER RESCHEDULING HEARING ON DEFENDANTS' MOTION FOR SUMMARY JUDGMENT OR ADJUDICATION on the interested parties in this action as follows:

John C. Manley Attorneys for Plaintiff Wade Robson Vince W. Finaldi

Alex E. Cunny Phone: 949-252-9990 Manly, Stewart & Finaldi 949-252-9991 Fax:

19100 Von Karman Ave., Suite 800 Email: vfinaldi@manlystewart.com Irvine, CA 92612 jmanly@manlystewart.com acunny@manleystewart.com kfrederiksen@manlvstewart.com

**BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed above and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Kinsella Weitzman Iser Kump LLP's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address mlaw@kwikalaw.com to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

BY OVERNIGHT DELIVERY: I caused said document(s) to be enclosed in an envelope or package provided by the overnight service carrier and addressed to the persons at the addresses listed above or on the attached Service List. I caused the envelope or package to be placed for collection and overnight delivery at an office or a regularly utilized drop box of the overnight service carrier or delivered such document(s) to a courier or driver authorized by the overnight service carrier to receive documents.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on February 22, 2021, at Los Angeles, California.

/s/ Michelle Law

Michelle Law

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