

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Amy E. Bracher, Esq. 292238 Stratman, Patterson & Hunter 505 14th Street, Suite 400 Oakland, CA 94612-1913		FOR COURT USE ONLY
TELEPHONE NO.: (510) 457-3468 FAX NO. (Optional): (510) 238-8968 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Defendant, Jimsee Chuluun		ELECTRONICALLY FILED Superior Court of California, County of San Francisco MAR 24 2015 Clerk of the Court BY: EDNALEEN JAVIER Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO STREET ADDRESS: 400 McAllister Street MAILING ADDRESS: 400 McAllister Street CITY AND ZIP CODE: San Francisco, CA 94102 BRANCH NAME:		
PLAINTIFF/PETITIONER: Sarah Leight DEFENDANT/RESPONDENT: Jimsee Chuluun		
CASE MANAGEMENT STATEMENT (Check one): <input type="checkbox"/> UNLIMITED CASE (Amount demanded \$25,000 exceeds \$25,000) <input checked="" type="checkbox"/> LIMITED CASE (Amount demanded is or less)		CASE NUMBER: CGC-14-543467
A CASE MANAGEMENT CONFERENCE is scheduled as follows: Date: May 6, 2015 Time: 10:30 am Dept.: Not Assigned Div.: Room:		
Address of court (if different from the address above): <input type="checkbox"/> Notice of Intent to Appear by Telephone, by (name):		

INSTRUCTIONS: All applicable boxes must be checked, and the specified information must be provided.

1. **Party or parties (answer one):**
 - a. This statement is submitted by party (name): Jimsee Chuluun
 - b. This statement is submitted jointly by parties (names):
2. **Complaint and cross-complaint (to be answered by plaintiffs and cross-complainants only)**
 - a. The complaint was filed on (date):
 - b. The cross-complaint, if any, was filed on (date):
3. **Service (to be answered by plaintiffs and cross-complainants only)**
 - a. All parties named in the complaint and cross-complaint have been served, or have appeared, or have been dismissed,
 - b. The following parties named in the complaint or cross-complaint
 - (1) have not been served (specify names and explain why not):
 - (2) have been served but have not appeared and have not been dismissed (specify names):
 - (3) have had a default entered against them (specify names):
 - c. The following additional parties may be added (specify names, nature of involvement in case, and the date by which they may be served):
4. **Description of case**
 - a. Type of case in complaint cross-complaint (Describe, including causes of action):

PLAINTIFF/PETITIONER: Sarah Leight	CASE NUMBER: CGC-14-543467
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4. b. Provide a brief statement of the case, including any damages. (*If personal injury damages are sought, specify the injury and damages claimed, including medical expenses to date [indicate source and amount], estimated future medical expenses, lost earnings to date, and estimated future lost earnings. If equitable relief is sought, describe the nature of the relief.*)
 This case arises out of a rear-end motor vehicle accident that occurred on or about May 31, 2014. The Plaintiff's claimed damages are still under investigation.

(If more space is needed, check this box and attach a page designated as Attachment 4b.)

5. **Jury or nonjury trial**

The party or parties request a jury trial a non-jury trial. *(If more than one party, provide the name of each party requesting a jury trial):*

6. **Trial date**

a. The trial has been set for *(date):*

b. No trial date has been set. This case will be ready for trial within 12 months of the date of the filing of the complaint *(if not, explain):*

c. Dates on which parties or attorneys will not be available for trial *(specify dates and explain reasons for unavailability):*
 Attorney for Defendant is already scheduled for trials on 5/18/2015, 7/13/2015, 08/31/2015, 10/05/2015, 10/14/2015, 10/23/2015, 1/8/2016, 1/22/2016, 2/26/2015, and 3/04/2015; taking vacation from 7/16/15-7/24/15. and set to attend training from 4/21/15-5/15/2015.

7. **Estimated length of trial**

The party or parties estimate that the trial will take *(check one):*

a. days *(specify number):* 5

b. hours *(short causes) (specify):*

8. **Trial representation (to be answered for each party)**

The party or parties will be represented at trial by the attorney or party listed in the caption by the following:

a. Attorney:

b. Firm:

c. Address:

d. Telephone number: e. Fax number:

f. E-mail address: g. Party represented:

Additional representation is described in Attachment 8.

9. **Preference**

This case is entitled to preference *(specify code section):*

10. **Alternative Dispute Resolution (ADR)**

a. **ADR information package.** Please note that different ADR processes are available in different courts and communities; read the ADR information package provided by the Court under rule 3.221 for information about the processes available through the court and community programs in this case.

(1) For parties represented by Counsel: Counsel has has not provided the ADR information package identified in rule 3.221 to the client and has reviewed ADR options with the client.

(2) For self-represented parties: Party has has not reviewed the ADR information package identified in rule 3.221.

b. **Referral to judicial arbitration or civil action mediation (if available).**

(1) This matter is subject to mandatory judicial arbitration under Code of Civil Procedure section 1141.11 or to civil action mediation under Code of Civil Procedure section 1775.3 because the amount in controversy does not exceed the statutory limit.

(2) Plaintiff elects to refer this case to judicial arbitration and agrees to limit recovery to the amount specified in Code of Civil Procedure section 1141.11.

(3) This case is exempt from judicial arbitration under rule 3.811 of the California Rules of Court or from civil action mediation under Code of Civil Procedure section 1775 et seq. *(specify exemption)*

PLAINTIFF/PETITIONER: Sarah Leight	CASE NUMBER: CGC-14-543467
DEFENDANT/RESPONDENT: Jimsee Chuluun	

10. c. Indicate the ADR process or processes that the party or parties are willing to participate in, have agreed to participate in, or have already participated in (*check all that apply and provide the specified information*):

	The party or parties completing this form are willing to participate in the following ADR processes (<i>check all that apply</i>):	If the party or parties completing this form in the case have agreed to participate in or have already completed an ADR process or processes, indicate the status of the processes (<i>attach a copy of the parties' ADR stipulation</i>)
(1) Mediation	<input checked="" type="checkbox"/>	<input type="checkbox"/> Mediation session not yet scheduled <input type="checkbox"/> Mediation session scheduled for (date): <input type="checkbox"/> Agreed to complete mediation by (date): <input type="checkbox"/> Mediation completed on (date):
(2) Settlement Conference	<input type="checkbox"/>	<input type="checkbox"/> Settlement conference not yet scheduled <input type="checkbox"/> Settlement conference scheduled for (date): <input type="checkbox"/> Agreed to complete settlement conference by (date): <input type="checkbox"/> Settlement conference completed on (date):
(3) Neutral Evaluation	<input type="checkbox"/>	<input type="checkbox"/> Neutral evaluation not yet scheduled <input type="checkbox"/> Neutral evaluation scheduled for (date): <input type="checkbox"/> Agreed to complete neutral evaluation by (date): <input type="checkbox"/> Neutral evaluation completed on (date):
(4) Nonbinding judicial arbitration	<input type="checkbox"/>	<input type="checkbox"/> Judicial arbitration not yet scheduled <input type="checkbox"/> Judicial arbitration scheduled for (date): <input type="checkbox"/> Agreed to complete judicial arbitration by (date): <input type="checkbox"/> Judicial arbitration completed on (date):
(5) Binding private arbitration	<input type="checkbox"/>	<input type="checkbox"/> Private arbitration not yet scheduled <input type="checkbox"/> Private arbitration scheduled for (date): <input type="checkbox"/> Agreed to complete private arbitration by (date): <input type="checkbox"/> Private arbitration completed on (date):
(6) Other (specify)	<input type="checkbox"/>	<input type="checkbox"/> ADR session not yet scheduled <input type="checkbox"/> ADR session scheduled for (date): <input type="checkbox"/> Agreed to complete ADR session by (date): <input type="checkbox"/> ADR session completed on (date):

PLAINTIFF/PETITIONER: Sarah Leight	CASE NUMBER: CGC-14-543467
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11. Insurance

- a. Insurance carrier, if any, for party filing this statement (*name*): Mid-Century Insurance Company
- b. Reservation of rights: Yes No
- c. Coverage issues will significantly affect resolution of this case (*explain*):

12. Jurisdiction

Indicate any matters that may affect the court's jurisdiction or processing of this case, and describe the status.

- Bankruptcy Other (*specify*):

Status:

13. Related cases, consolidation, and coordination

- a. There are companion, underlying, or related cases.
- (1) Name of case:
(2) Name of court:
(3) Case number:
(4) Status:
 Additional cases are described in Attachment 14a.
- b. A motion to consolidate coordinate will be filed by (*name party*):

14. Bifurcation

- The party or parties intend to file a motion for an order bifurcating, severing, or coordinating the following issues or causes of action (*specify moving party, type of motion, and reasons*):

15. Other motions

- The party or parties expect to file the following motions before trial (*specify moving party, type of motion, and issues*):

16. Discovery

- a. The party or parties have completed all discovery.
- b. The following discovery will be completed by the date specified (*describe all anticipated discovery*):

<u>Party</u>	<u>Description</u>	<u>Date</u>
Defendant(s)	Written Discovery to Plaintiff	05/31/2015
Defendant(s)	Deposition of Plaintiff	05/31/2015
Defendant(s)	Subpoena of Medical and other records	06/30/2015
Defendant(s)	Medical Examination of Plaintiff (IME)	TBD

- c. The following discovery issues, including issues regarding the discovery of electronically stored information, are anticipated (*specify*):

PLAINTIFF/PETITIONER: Sarah Leight	CASE NUMBER: CGC-14-543467
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17. Economic litigation

- a. This is a limited civil case (i.e., the amount demanded is \$25,000 or less) and the economic litigation procedures in Code of Civil Procedure sections 90 through 98 will apply to this case.
- b. This is a limited civil case and a motion to withdraw the case from the economic litigation procedures or for additional discovery will be filed (*if checked, explain specifically why economic litigation procedures relating to discovery or trial should not apply to this case*):

18. Other issues

- The party or parties request that the following additional matters be considered or determined at the case management conference (*specify*):

19. Meet and confer

- a. The party or parties have met and conferred with all parties on all subjects required by rule 3.724 of the California Rules of Court (*if not, explain*):
- b. After meeting and conferring as required by rule 3.724 of the California Rules of Court, the parties agree on the following (*specify*):

20. Total number of pages attached (*if any*): _____

I am completely familiar with this case and will be fully prepared to discuss the status of discovery and ADR, as well as other issues raised by this statement, and will possess the authority to enter into stipulations on these issues at the time of the case management conference, including the written authority of the party where required.

Date: March 20, 2015

Amy E. Bracher
(TYPE OR PRINT NAME)

► 
(SIGNATURE OF PARTY OR ATTORNEY)
► 
(SIGNATURE OF PARTY OR ATTORNEY)

Additional signatures are attached.

1 Re: Leight v. Chuluun, et al.
2 Case Number: CGC-14-543467

3
4 **PROOF OF SERVICE**
5 **Code of Civil Procedure §§ 1013a, 2015.5**

6
7 I am a resident of the State of California and over the age of eighteen years, and not a party to the
8 within action. My business address is 505 14th Street, Suite 400, Oakland, CA 94612-1913. On March
9 24, 2015, I served the following document(s):

10 **CASE MANAGEMENT STATEMENT**

11 By placing the document(s) listed above in a sealed envelope, addressed as set forth
12 below, and placing the envelope for collection and mailing in the place designated for
13 such in our offices, following ordinary business practices.

14 By transmitting via facsimile the document(s) listed above to the fax number(s) set
15 forth below on this date before 5:00 p.m.

16 By causing a true copy thereof to be personally delivered to the person(s) at the
17 address(es) set forth below.

18 By electronically serving the document(s) described above via a Court approved File
19 & Serve vendor on those recipients designated on the Transaction Receipt located on
20 the vendor's Website.

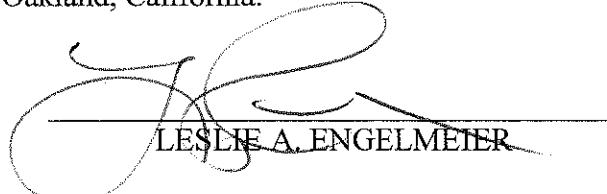
21 By electronically serving the document(s) to the electronic mail address set forth
22 below on this date before 5:00 p.m. pursuant to the signed stipulation of the parties
23 and consistent with Code of Civil Procedure section 1010.6(a)(2).

24 **SEE ATTACHED SERVICE LIST**

25 I am readily familiar with the firm's practice of collection and processing correspondence for
26 mailing with the United States Postal Service. Under that practice, it would be deposited with U.S.
27 Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I
28 am aware that on motion of the party served, service is presumed invalid if postal cancellation date or
postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true
and correct.

Executed on March 24, 2015, at Oakland, California.

29
30 
31 LESLIE A. ENGELMETER

1 Re: Leight v. Chuluun, et al.
2 Case Number: CGC-14-543467

3 **SERVICE LIST**

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7 San Francisco, CA 94104
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