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SACRAMENTO COURTS
DEPT. #53 #54

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Attorneys for Defendant, Brent Hanson

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SACRAMENTO

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GLENN HAGELE,

Plaintiff,

v.

BRENT HANSON, and DOES 1 through 20,

Defendants.

) Case No. 06AS00839

) NOTICE OF MOTION AND MOTION TO
) DISMISS PLAINTIFF'S COMPLAINT
) PURSUANT TO C.C.P. §§583.310, 583.410

) DATE: JULY 21, 2011
) TIME: 2:00 P.M.
) DEPT. 53

) Date Action Filed: March 2, 2006

TO PLAINTIFF IN PRO PER, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:
PLEASE TAKE NOTICE that on June 21, 2011, at 2:00 p.m., or as soon thereafter as the matter may be heard, in Department 53 of this Court, located at 720 Ninth Street, Sacramento, California, Defendant, BRENT HANSON, will and hereby does move this Court for an Order Dismissing Plaintiff's Complaint for Failure to Bring the Matter to Trial.

The Motion will be based upon the provisions of the California Code of Civil Procedure §§ 583.410 and 583.310, this Notice, the attached Memorandum of Points and Authorities in Support, the Declaration of Michael E. Myers, the files and records in this action, and any further evidence and argument that the Court may receive at or before the hearing.

Pursuant to Local Rule 3.04, the court will make a tentative ruling on the merits of this matter by 2:00 p.m., the court day before the hearing. You may access and download the court's

1 ruling from the court's website at <http://www.saccourt.com>. If you do not have online access, you
2 may obtain the tentative ruling over the telephone by calling (916) 874-8142 and a deputy clerk will
3 read the ruling to you. If you wish to request oral argument, you must contact the courtroom clerk at
4 (916) 874-7858 (Department 53) or (916) 874-7848 (Department 54) and the opposing party before
5 4:00 p.m. the court day before the hearing. If you do not call the court and the opposing party by
6 4:00 p.m. on the court day before the hearing, no hearing will be held.

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8 Dated. May 23, 2011

CAULFIELD DAVIES & DONAHUE, LLP

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10 By: 

JAMES R. DONAHUE

MICHAEL E. MYERS

Attorneys for defendant, BRENT HANSON

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1 **RE: Hagele v. Hanson, et al.**
2 **Sacramento County Superior Court Case No. 06AS00839**

3 **CERTIFICATE OF SERVICE**

4 I am a citizen of the United States, over 18 years of age, employed in the County of
5 Sacramento, and not a party to the within action. My business address is 1 Natoma Street, Folsom,
6 California 95630.

7 On May 24, 2011, I served the within, **NOTICE OF MOTION AND MOTION TO
8 DISMISS PLAINTIFF'S COMPLAINT**, on the following parties in said action by placing a true
9 copy thereof enclosed in a sealed envelope addressed as follows:

10 **Plaintiff In Pro Per**

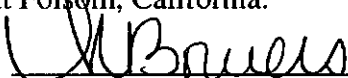
11 Glenn Hagele
12 8543 Everglade Drive
13 Sacramento, CA 95826
14 **(916) 650-1241**

15 [X] (BY MAIL) I caused such envelope with postage thereon fully prepaid to be placed in the
16 United States mail at Folsom, California. I am familiar with my firm's practice whereby the
17 mail is given the appropriate postage and is placed in a designated area to be deposited in a
18 U.S. mail box in Folsom, California in the ordinary course of business.

19 [] (BY FACSIMILE/TELECOPIER/MAIL) I personally sent to the addressee's telecopier
20 number (noted above) a true copy of the above-described documents. On this same date, I
21 caused a true copy to be placed in the U.S. mail at Folsom, California.

22 [] (BY FEDERAL EXPRESS MAIL) I caused such envelope marked for overnight delivery to be
23 placed in the Federal Express Depository in Folsom, California.

24 I declare under penalty of perjury under the laws of the State of California that the foregoing
25 is true and correct and executed on May 24, 2011, at Folsom, California.

26 
27 MICHELLE BOWERS
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