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Laura Campbell (SBN: 3414836)
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Attorneys for Plaintiff
ELIZABETH CONNELL

ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco

11/10/2025
Clerk of the Court
BY: JAMES FORONDA
Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
CITY AND COUNTY OF SAN FRANCISCO

ELIZABETH CONNELL,

Plaintiff,

vs.

MICHAEL EPSTEIN, and DOES 1 through
10, inclusive

Defendants.

Case No. CUD-23-671141

**NOTICE OF UNAVAILABILITY FOR
ASHLEY E. KLEIN AND LAURA L.
CAMPBELL**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that counselors for Plaintiff ELIZABETH CONNELL, Ashley E. Klein and Laura L. Campbell have the following upcoming unavailability:

November 17th: Deposition

November 19th – 20th: Pre-planned travel

November 21st– 24th: In-person hearings in Los Angeles Superior Court

December 1st– 3rd: Pre-planned travel

December 22nd– January 2nd: Pre-planned travel

January 5th: Mediation

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January 12th–16th: Trial

February 9th–20th: Trial

March 9th–13th: Trial

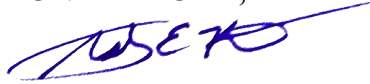
Ms. Klein and Ms. Campbell will be unavailable for all purposes, including but not limited to receiving notice of any kind, appearing in Court, commencing trial, or responding to *ex parte* applications.

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1 Purposefully scheduling a conflicting proceeding without good cause is conduct subject to
2 sanctions. *Tenderloin Housing Clinic v. Sparks* (1992) 8 Cal.App.4th 299.

3 Dated: November 10, 2025

NIXON PEABODY, LLP

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6 Ashley E. Klein, Esq.
7 Laura Campbell, Esq.
8 Attorneys for Plaintiff
9 ELIZABETH CONNELL
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ELIZABETH CONNELL,

Plaintiff,

vs.

MICHAEL EPSTEIN, and DOES 1 through
10, inclusive

Defendants.

Case No. CUD-23-671141

**UPDATED NOTICE OF
UNAVAILABILITY FOR ASHLEY E.
KLEIN AND LAURA L. CAMPBELL**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that counselors for Plaintiff ELIZABETH CONNELL, Ashley E. Klein and Laura L. Campbell have the following upcoming unavailability:

December 16th-19th: Emergency Medical Appointments for minor child of first chair counsel. Counsel notes these medical appointments were not known to, nor expected by counsel at the time the first Notice of Unavailability was filed, and have only arisen extremely recently. Counsel is updating their availability via this Notice as early as counsel is able.

December 22nd– January 2nd: Pre-planned travel

January 5th-6th: Mediation

1 January 7th: Medical Appointment

2 January 12th–16th: Trial

3 January 19th: Pre-Planned Travel

4 February 9th–20th: Trial

5 February 26th: Speaking Event

6 March 6th: Pre-Planned Travel

7 March 9th–13th: Trial

8 Ms. Klein and Ms. Campbell will be unavailable for all purposes, including but not limited to
9 receiving notice of any kind, appearing in Court, commencing trial, or responding to *ex parte*
10 applications.

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3 Dated: December 11, 2025

NIXON PEABODY, LLP

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