

1      Ashley E. Klein (SBN: 291586)  
2      Laura Campbell (SBN: 3414836)  
3      **NIXON PEABODY, LLP**  
4      One Embarcadero Center, 32<sup>nd</sup> Floor  
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**ELECTRONICALLY  
FILED**  
*Superior Court of California,  
County of San Francisco*

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

5 Attorneys for Plaintiff  
6 ELIZABETH CONNELL

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

10 ELIZABETH CONNELL,  
11 Plaintiff,  
12 vs.

Case No. CUD-23-671141

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

14 MICHAEL EPSTEIN, and DOES 1 through  
15 10, inclusive

16 Defendants.

20 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

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

23 || November 17<sup>th</sup>: Deposition

24 || November 19<sup>th</sup> – 20<sup>th</sup>: Pre-planned travel

25 November 21<sup>st</sup>– 24<sup>th</sup>: In-person hearings in Los Angeles Superior Court

26 December 1<sup>st</sup>– 3<sup>rd</sup>: Pre-planned travel

27 December 22<sup>nd</sup>– January 2<sup>nd</sup>: Pre-planned travel

January 5<sup>th</sup>: Mediation

1                   January 12<sup>th</sup>–16<sup>th</sup>: Trial

2                   February 9<sup>th</sup>–20<sup>th</sup>: Trial

3                   March 9<sup>th</sup>–13<sup>th</sup>: Trial

4                   Ms. Klein and Ms. Campbell will be unavailable for all purposes, including but not limited to  
5 receiving notice of any kind, appearing in Court, commencing trial, or responding to *ex parte*  
6 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

4 **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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Ashley E. Klein (SBN: 291586)  
Laura Campbell (SBN: 3414836)  
NIXON PEABODY, LLP  
One Embarcadero Center, 32<sup>nd</sup> Floor  
San Francisco, CA 94111  
415-984-8200  
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Attorneys for Plaintiff  
ELIZABETH CONNELL

**ELECTRONICALLY  
FILED**  
*Superior Court of California,  
County of San Francisco*

**12/11/2025  
Clerk of the Court  
BY: JAMES FORONDA  
Deputy Clerk**

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

ELIZABETH CONNELL.

Case No. CUD-23-671141

Plaintiff,

VS.

MICHAEL EPSTEIN, and DOES 1 through 10, inclusive

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

## Defendants.

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 16<sup>th</sup>-19<sup>th</sup>: 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 22<sup>nd</sup>– January 2<sup>nd</sup>: Pre-planned travel

January 5<sup>th</sup>-6<sup>th</sup>: Mediation

1                   January 7<sup>th</sup>: Medical Appointment

2                   January 12<sup>th</sup>–16<sup>th</sup>: Trial

3                   January 19<sup>th</sup>: Pre-Planned Travel

4                   February 9<sup>th</sup>–20<sup>th</sup>: Trial

5                   February 26<sup>th</sup>: Speaking Event

6                   March 6<sup>th</sup>: Pre-Planned Travel

7                   March 9<sup>th</sup>–13<sup>th</sup>: 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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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: December 11, 2025

4 **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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