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11 UNITED STATES DISTRICT COURT
 12 EASTERN DISTRICT OF CALIFORNIA
 13 SACRAMENTO DIVISION

14 RICHARD SPRINGER,
 15 Plaintiff,
 16 v.
 17 R+L CARRIERS, INC., et al.,
 18 Defendants.

Case No.: 2:10-CV-00907-MCE-JFM

**STIPULATION AND ORDER TO
 EXTEND DEADLINES FOR R+L
 CARRIERS, INC.'S TO MOVE OR
 PLEAD IN RESPONSE TO THE
 COMPLAINT AND FOR THE PARTIES
 TO FILE THEIR JOINT STATUS
 REPORT**

19 Plaintiff RICHARD SPRINGER (“Springer”) and Defendant R+L CARRIERS, INC.
 20 (“R+L”), through their attorneys of record hereby request that the Court, pursuant to Local Rule
 21 144, extend the deadline for R+L to move or plead in response to the Complaint by sixty (60)
 22 days, until July 10, 2010. Furthermore, the parties request that the Court extend the deadline for
 23 filing the Joint Status Report to July 23, 2010 set forth in the Order Requiring Joint Status
 24 Report. The parties further stipulate as follows:

25 1. Springer filed his Complaint for Breach of Government Code Section 12940, et
 26 seq: Discrimination on the basis of disability and/or perceived disability; Breach of Government
 27 Code Section 12940, et seq: Failure to accommodate and/or engage in an interactive process;
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1 Breach of Government Code Section 12945.1, et seq: Refusal to grant and/or discrimination for
2 taking a medical leave of absence, in the Yolo County Superior Court on or about March 1,
3 2010. Springer served the complaint on R+L on or about March 23, 2010.

4 2. R+L filed a Notice of Removal with the United States District Court for the
5 Eastern District of California on or about April 14, 2010.

6 3. Pursuant to Local Rule 144, the parties agreed to extend R+L's deadline to move
7 or plead in response to the Complaint by less than twenty eight (28) days, until May 11, 2010,
8 and filed said stipulation with the Court on or about April 21, 2010.

9 4. The parties in this matter now jointly seek from this Court an Order extending
10 Defendant R+L's deadline to move or plead in response to the Complaint by 60 days from the
11 deadline agreed to by the parties. The parties request that the Court extend the deadline until
12 July 10, 2010.

13 5. Following R+L's removal of this matter to this Court, the parties began to
14 engage in discussions aimed at resolving this case informally. During those discussions, the
15 parties agreed that an early mediation would be productive.

16 6. The parties are working diligently to schedule a private mediation regarding this
17 case, and other similar litigation, to take place in June 2010. The requested extension would
18 allow that mediation to occur and potentially resolve the matter in its entirety without further
19 expense of judicial resources.

20 7. Furthermore, the mediation will likely include at least one other unrelated case in
21 which Plaintiff's counsel also represents the party in that separate litigation. Because the
22 mediation will encompass two separate plaintiffs in two separate actions, additional time for
23 scheduling and coordination is required.

24 8. The parties believe that the sixty (60) day extension of R+L's deadline to move
25 or plead in response to the complaint will provide the parties will sufficient time to fully explore
26 the possibility of early resolution of the claims at issue in this case.

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Upon a showing of good cause as to why the deadline should be moved, IT IS HEREBY ORDERED that:

1. The deadline for R+L CARRIERS, INC. to move or plead in response to Plaintiff's Complaint shall be extended up through July 10, 2010.

2. The deadline for the parties to prepare and file the Joint Status Report shall be extended up through July 23, 2010.

Dated: May 11, 2010


MORRISON C. ENGLAND, JR
UNITED STATES DISTRICT JUDGE