

1 BARBARA BOZMAN-MOSS (CSBN 129275)
 2 Bozman-Moss & Watson
 3 700 College Avenue
 4 Santa Rosa, California 95404-4107
 5 Tel: (707) 575-6000
 6 Fax: (707) 575-6014
 7 E-mail: barbara@bmw-law.com

8 Attorney for Plaintiffs

9 JOSEPH P. RUSSONIELLO (CSBN 44332)
 10 United States Attorney
 11 JOANN M. SWANSON (CSBN 88143)
 12 Chief, Civil Division
 13 ELLEN M. FITZGERALD (NY 2408805)
 14 Assistant United States Attorney
 15 450 Golden Gate Avenue, Box 36055
 16 San Francisco, CA 94102-3495
 17 Tel: (415) 436-7314
 18 Fax: (415) 436-6748
 19 E-mail: ellen.fitzgerald@usdoj.gov

20 Attorneys for Defendant

21 UNITED STATES DISTRICT COURT
 22 NORTHERN DISTRICT OF CALIFORNIA
 23 SAN FRANCISCO DIVISION

24 RICHARDO ANGEL NAVARRETTE and
 25 KELLY KASLAR,

26 Plaintiffs,

27 v.

28 UNITED STATES OF AMERICA,

Defendant.

CASE NO. C 04-0760 JSW

**STIPULATION AND JOINT MOTION
 TO EXTEND DEADLINE FOR
 COMPLETION OF MEDIATION;
 [~~PROPOSED~~] ORDER**

Subject to this Court's approval, plaintiff, Ricardo Angel Navarrette, and defendant, the United States of America, by and through their undersigned counsel, hereby stipulate and agree to continue the deadline for completion of court-connected mediation to March 6, 2009. This Federal Tort Claims Act case is currently set for bench trial beginning on April 27, 2009. The pre-trial

1 conference will take place on April 6, 2009. This request will cause no change to the pre-trial
2 conference date or the trial date.

3 The parties have completed factual discovery. The additional time is necessary to allow the
4 parties to complete expert witness depositions. As currently scheduled, the last expert deposition in
5 this matter is scheduled for February 27, 2009. In the absence of all expert testimony, the parties
6 agree they lack sufficient information to engage in a meaningful mediation session. The parties
7 conferred with the mediator, Christopher Johns, and scheduled a mediation session for March 6,
8 2009.

9 The parties therefore jointly request that the Court extend the deadline for the completion of
10 court-connected mediation from February 27, 2009 until March 6, 2009.

11 **IT IS SO STIPULATED.**

12 Dated: February 2, 2009

13 Respectfully submitted,
14 JOSEPH RUSSONIELLO
15 United States Attorney

16 By: _____ /s/
17 ELLEN M. FITZGERALD
18 Assistant United States Attorney
19 Attorney for Defendant

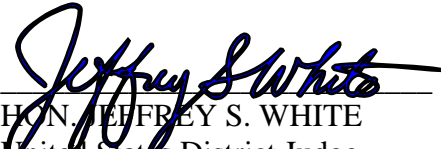
20 BOZMAN-MOSS & WATSON

21 By: _____ /s/
22 BARBARA BOZMAN-MOSS
23 Attorney for Plaintiff

24 **APPROVED AND SO ORDERED.**

25 The Court hereby extends the deadline for court-connected mediation until March 6, 2009.
26 All other dates remain the same.

27 Dated: _____ February 3____, 2009

28 
HON. JEFFREY S. WHITE
United States District Judge