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6 Attorneys for Defendant  
 7 AMERICAN EXPRESS TRAVEL RELATED SERVICES  
 COMPANY, INC.

9 **UNITED STATES DISTRICT COURT**  
 10 **NORTHERN DISTRICT OF CALIFORNIA**

12 SANDRA VERMA,  
 13 Plaintiff,  
 14 v.  
 15 AMERICAN EXPRESS, a New York  
 corporation; DOES 1-25, inclusive,  
 16 Defendant.

) Case No. C 08-02702 SI

) Judge: Hon. Susan Y. Illston

) **STIPULATION AND [PROPOSED]**  
 ) **ORDER REGARDING RESOLUTION IN**  
 ) **PRINCIPLE**

) Action Filed: May 29, 2008  
 ) Trial Date: Sept. 21, 2009

**STIPULATION**

IT IS HEREBY STIPULATED by and between Defendant American Express Travel Related Services Company, Inc. ("Defendant") and Plaintiff Sandra Verma ("Plaintiff"), through their respective counsel (collectively the "Parties"), as follows:

1. As the Court may recall, on August 6, 2009, the Parties reached a resolution in principle of this action. As a result, on August 7, 2009, the Court dismissed this action, with the stipulation that Plaintiff had 60 days thereafter to inform the Court if the resolution was not completed, in which case this litigation would be put back on the Court's calendar, including the Parties' several pending motions.

2. The Parties have been diligently negotiating the terms of the resolution in principle. The process was delayed for a short period of time by previously-scheduled vacations; however, the Parties have now resolved all except for one outstanding issue, which one issue the Parties expect to resolve by October 6, 2009. Thereafter, an agreement can be signed reflecting the resolution in principle, and after a 7-day waiting period, the resolution in principle will be completed.

3. The Plaintiff's return date to the Court to inform the Court that the matter has not been resolved is October 6, 2009, but as noted above, the Parties need approximately three more weeks to complete the resolution in principle. The Parties do not desire to be placed back on the Court's trial calendar and believe that would be counter-productive, and instead only need a short extension of time to complete the resolution in principle. As a result, the Parties respectfully request the Court to extend the time period for Plaintiff to return to Court if the resolution in principle for three additional weeks, to October 27, 2009.

IT IS SO STIPULATED:

Dated: October 5, 2009

PIERCE & SHEARER LLP

By: /S/ - Andrew F. Pierce

Andrew F. Pierce

Attorneys for Plaintiff  
SANDRA VERMA

1 Dated: October 5, 2009

CARLTON DiSANTE & FREUDENBERGER LLP

2  
3 By: /S/ - Connor J. Moyle

Connor J. Moyle

4 Attorneys for Defendant  
5 AMERICAN EXPRESS TRAVEL RELATED SERVICES  
6 COMPANY, INC.

7 \* \* \* \* \*

8 PURSUANT TO THE ABOVE STIPULATION, AND GOOD CAUSE APPEARING, IT  
9 IS ORDERED THAT PLAINTIFF SHALL HAVE UNTIL OCTOBER 27, 2009, TO INFORM  
10 THE COURT THAT THE RESOLUTION IN PRINCIPLE HAS NOT BEEN COMPLETED.

11 

12 Dated: \_\_\_\_\_

13 The Honorable Susan Illston  
14 Judge, United States District Court