

1 LINDBERGH PORTER, SBN 100091
2 ROBERT L. ZALETEL, SBN 096262
3 NEVILLE F. FERNANDES, SBN 240935
4 LITTLER MENDELSON
5 A Professional Corporation
6 650 California Street, 20th Floor
7 San Francisco, CA 94108.2693
8 Telephone: 415.433.1940
9 Fax: 415.399.8490
10 Email: lporter@littler.com
11 rzaletel@littler.com
12 nfernandes@littler.com

13 Attorneys for Defendants
14 HEARST CORPORATION ; and HEARST
15 COMMUNICATIONS, INC. dba HEARST
16 NEWSPAPERS

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA

19 MARSHA GINSBURG,
20 Plaintiff,

21 v.

22 HEARST COMMUNICATIONS, INC.;
23 HEARST CORPORATION; HEARST
24 NEWSPAPERS,
25 Defendants.

Case No. CV-08-3031 JSW

**STIPULATION AND PROPOSED ORDER
EXTENDING TIME FOR COMPLETING
MEDIATION**

26 WHEREAS, this is an employment discrimination/retaliation case brought by a
27 former employee of Defendants; and

28 WHEREAS, on November 13, 2008; this matter was referred to Dana Curtis for
mediation; and

WHEREAS, on December 15, 2008, the parties held a pre-mediation conference call
with the Court-appointed mediator, Dana Curtis, to discuss dates for the mediation; and

WHEREAS, Plaintiff's Complaint spans the period of Plaintiff's work history of
over 20 years, and includes multiple claims under various discrimination and retaliation statutes; and

WHEREAS, both Parties believe that they need to conduct several depositions and
propound written discovery before a meaningful mediation can take place; and

**STIP. AND ORDER EXTENDING TIME
FOR COMPLETING MEDIATION**

Case No. CV-08-3031 JEW

LITTLER MENDELSON
A PROFESSIONAL CORPORATION
650 CALIFORNIA STREET
20TH FLOOR
SAN FRANCISCO, CA 94108.2693
+1 415 433 1940

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WHEREAS, the Parties plan to conduct this discovery in January and February 2009;
and

WHEREAS, the Parties have tentatively scheduled mediation with Dana Curtis for
March 16, 2009 (subject to the Court extending the time to complete mediation); and

WHEREAS, the Parties believe that the current February 1, 2009 deadline for
completing mediation will not give sufficient time to conduct adequate discovery to allow for a
meaningful mediation.

THEREFORE, the Parties request that the Court extend the time for completing
mediation from February 1, 2009 to March 31, 2009.

IT IS SO STIPULATED.

DATED: December 26, 2008


LOIS HIGHMAN
Attorney for Plaintiff
MARSHA GINSBURG

DATED: December 30, 2008


LINDBERGH PORTER
Attorney for Defendants
HEARST CORPORATION ; and HEARST
COMMUNICATIONS, INC. dba HEARST
NEWSPAPERS

PROPOSED ORDER

For good cause appearing, the Parties shall have through March 31, 2009 to complete
mediation in this case.

IT IS SO ORDERED.

January 5, 2009


THE HONORABLE JEFFREY S. WHITE

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**STIP. AND ORDER EXTENDING TIME
FOR COMPLETING MEDIATION**