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Attorneys for Federal Defendant

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Department of the Army, San Francisco District,

Corps of Engineers

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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA

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SAN FRANCISCO DIVISION

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JANET B. SEASTROM,

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Plaintiff,

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v.

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DEPARTMENT OF THE ARMY,

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SAN FRANCISCO DISTRICT,

CORPS OF ENGINEERS, AND

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FRIENDS OF THE BAY MODEL

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Defendants.

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NO. C 08-4108 EMC

STIPULATION AND [PROPOSED] ORDER
TO CONTINUE CASE MANAGEMENT
CONFERENCE

1 Plaintiff Janet Seastrom, in Pro Per, and Federal Defendant Department of the Army, by and
2 through its undersigned counsel, hereby stipulate as follows:

3 WHEREAS, the hearing on Defendant's motion to dismiss Plaintiff's complaint is set for
4 November 26, 2008 after being continued from October at Plaintiff's request.

5 WHEREAS, the Case Management Conference ("CMC") in this matter is currently set for
6 December 3, 2008.

7 WHEREAS the parties understand there are various items they are obligated to discuss in order to
8 prepare for the CMC and that the parties are obligated to recommend a case management plan for the
9 case and prepare a written joint statement.

10 WHEREAS the parties agree that the Court's ruling on the pending motion to dismiss may make
11 the CMC and the required meet and confer for the CMC null and void.

12 WHEREAS the parties agree that it is more efficient for all parties and the Court to meet and
13 confer for and attend a CMC after the Court has ruled on the pending motion to dismiss.

14 ACCORDINGLY, the parties request that the Court continue the Case Management Conference
15 from December 3, 2008 until January 14, 2009. Joint CMC statement due January 7, 2009.

16 **IT IS SO STIPULATED**

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18 DATED: November 13, 2008

PLAINTIFF

Janet Seastrom
Janet Seastrom, In Pro Per

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21 DATED: November 13, 2008

JOSEPH RUSSONIELLO
United States Attorney

Victoria R. Carradero
Victoria R. Carradero
Assistant United States Attorney
Attorneys for Federal Defendant

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25 **PURSUANT TO STIPULATION IT IS SO ORDERED.**

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27 DATED: November 17, 2008

