

1 MICHAEL E. ADAMS
 2 LAW OFFICES OF MICHAEL E. ADAMS
 3 702 Marshall Street, Suite 300
 4 Redwood City, California 94063
 Telephone: (650) 599-9463
 Facsimile: (650) 599-9785

5 Attorney for Plaintiff
 ROSE R. BARTONICO

6
 7 GARY R. BASHAM (Bar No. 130119)
 KELLEY S. KERN (Bar No. 221265)
 8 BASHAM PARKER LLP
 9 701 University Avenue, Suite 220
 Sacramento, California 95825
 Telephone: (916) 925-5850
 10 Facsimile: (916) 925-5854

11 Attorneys for Defendant
 SEARS HOME IMPROVEMENT PRODUCTS, INC.

12
 13 UNITED STATES DISTRICT COURT
 14
 15 NORTHERN DISTRICT OF CALIFORNIA

16 ROSE R. BARTONICO,
 17 Plaintiff,
 18 v.
 19 SEARS HOME IMPROVEMENT PRODUCTS,
 INC. a corporation, and DOES 1 to 20, inclusive,
 20 Defendants.
 21

Case No. 3:08-cv-04667-SI

**STIPULATION AND ORDER TO
 CONTINUE MEDIATION
 COMPLETION DATE AND CASE
 MANAGEMENT CONFERENCE**

Trial Date: April 26, 2010

22 WHEREAS, at the Initial Case Management Conference conducted by this court
 23 on January 23, 2009, the Court instructed the parties to engage in and complete mediation no later
 24 than May 29, 2009.

25 WHEREAS, Michael Orstil with JAMS was selected by the parties to mediate this
 26 matter;

27 WHEREAS, the parties have both had several scheduling conflicts that have
 28 prevented them from scheduling mediation prior to the completion date;

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

WHEREAS, the parties have jointly agreed and stipulated to respectfully request that this Court grant a 60-day continuance of the mediation completion deadline date from May 29, 2009 to August 28, 2009;

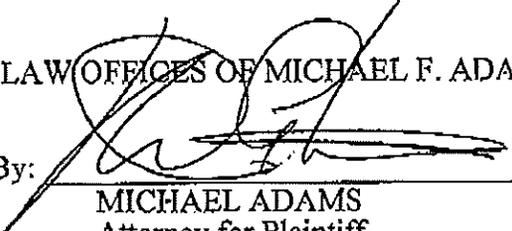
WHEREAS, the parties have jointly agreed and stipulated to respectfully request that this Court grant a 60-day continuance of the Case Management Conference currently scheduled for June 12, 2009;

WHEREAS, this request is not being made of the purposes of delay, or any other improper purpose;

WHEREAS, continuing the mediation completion deadline and the case management conference will not prejudice either party or their counsel; and

NOW, THEREFORE, IT IS HEREBY STIPULATED and agreed by Plaintiff and Defendant, through their respective attorneys of record, that this Court continue the Mediation Completion Deadline and the Case Management Conference.

Dated: April 17, 2009

LAW OFFICES OF MICHAEL F. ADAMS
By: 
MICHAEL ADAMS
Attorney for Plaintiff
ROSE R. BARTONICO

Dated: April 21, 2009

BASHAM PARKER LLP
By: 
GARY R. BASHAM
KELLEY S. KERN
Attorneys for Defendant
SEARS, ROEBUCK & CO.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

Having reviewed the Stipulation of the parties, and good cause appearing:

IT IS HEREBY ORDERED THAT the Mediation Completion Deadline, currently set for May 29, 2009, be continued to August 28, 2009.

IT IS FURTHER HEREBY ORDERED THAT the Case Management Conference currently set for June 12, 2009, be continued to August 28, 2009 @ ~~2:30 p.m.~~ 3:00 pm

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: _____



Hon. Susan Illston
UNITED STATES DISTRICT JUDGE