

Winston & Strawn LLP  
101 California Street  
San Francisco, CA 94111-5802

1 AMANDA GROVES (SBN: 187216)  
[agroves@winston.com](mailto:agroves@winston.com)  
2 MATTHEW K. NARENSKY (SBN: 215604)  
[mnarensky@winston.com](mailto:mnarensky@winston.com)  
3 LEDA MOUALLEM (SBN: 221258)  
[lmouallem@winston.com](mailto:lmouallem@winston.com)  
4 ALVINA WONG (SBN: 266381)  
[awong@winston.com](mailto:awong@winston.com)  
5 WINSTON & STRAWN LLP  
101 California Street  
6 San Francisco, CA 94111-5802  
Telephone: (415) 591-1000  
7 Facsimile: (415) 591-1400  
8 Attorneys for Defendant and Cross-Defendant  
ENRIQUETA MENDOZA  
9

10 UNITED STATES DISTRICT COURT  
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION  
13

14 STEVENSON ENTERPRISES, a California  
general partnership )

15 Plaintiff, )

16 v. )

17 ENRIQUETA MENDOZA; ESTATE OF )  
18 DAVID Z. MENDOZA; HAK CHON LEE; )  
19 JEUM SOON LEE; HYSL, INC. a California )  
corporation; and YONG W. LEE, )

20 Defendants. )  
21

22 This document relates to ALL ACTIONS. )  
23

Case No. C 08 4845 EMC

STIPULATION AND [PROPOSED]  
ORDER REGARDING EXTENSION OF  
MEDIATION DEADLINE AND  
SHORTENING OF TIME TO REQUEST  
THE EXTENSION

1 Stevenson Enterprises, Hak Chon Lee, Jeum Soon Lee, HYSL, Inc., Yong Lee, and  
2 Enriqueta Mendoza (hereinafter the “Stipulating Parties”) jointly submit this Stipulation and  
3 [Proposed] Order Regarding Extension of Mediation Deadline and Shortening of Time to Request  
4 the Extension for the reasons set forth below:

- 5 1. On March 2, 2011 at Docket Entry No. 84, the Court ordered the parties to complete a  
6 mediation of this matter on or before April 29, 2011. This Order was made pursuant to a  
7 previous stipulation requesting an extension of the March 15, 2011 deadline the Court  
8 previously set for mediation in this matter.
- 9 2. On April 14, 2011, pursuant to Northern District of California ADR Local Rule 6-10(d),  
10 and due his mother’s hospitalization and current acute medical issues, Mr. Andres  
11 Mendoza (“Mr. Mendoza”), guardian ad litem for Defendant and Cross-Defendant  
12 Enriqueta Mendoza, requested that he be excused from personal attendance at the  
13 mediation scheduled in this matter on April 29, 2011 and instead requested that he be  
14 allowed to participate by telephone. On April 21, 2011 at Docket Entry No. 85, Northern  
15 District of California ADR Magistrate Judge Elizabeth D. Laporte denied Mr. Mendoza’s  
16 request ordered that Mr. Mendoza shall appear in person at the mediation to be held in  
17 this matter.
- 18 3. As a result of Judge Laporte’s Order, on April 25, 2011, the mediator convened a  
19 telephone conference to discuss rescheduling the mediation. Due to various scheduling  
20 conflicts, the mediator and the parties are unavailable to reschedule the mediation until a  
21 date following July 22, 2011. Accordingly, the mediator and the Stipulating Parties  
22 agree, subject to the Court’s approval, to complete a mediation of this matter by July 31,  
23 2011.
- 24 4. An extension of the deadline for a mediation of this matter may impact the dates the  
25 Court set for the status conference (currently set for May 18, 2011 at 2:30 p.m.) and the  
26 deadline for an updated joint status report (currently due May 11, 2011).
- 27 5. Northern District of California ADR Local Rule 6-5 states that “[r]equests for extension  
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of the deadline for conducting a mediation must be made no later than 14 days before the session is to be held . . . .” However, Magistrate Judge Laporte’s Order on April 21, 2011 requiring Mr. Mendoza to appear in person at the mediation was entered less than 14 days before the mediation scheduled on April 29, 2011. Northern District of California Civil Local Rule 6-2 allows the parties to stipulate to a request to shorten a time fixed by a local rule. The parties agree to request that the Court shorten the 14-day time period under Northern District of California ADR Local Rule 6-5 for this request to extend the deadline for mediation.

Based thereon the Stipulating Parties and the mediator respectfully request that this court shorten the 14-day time period under Northern District of California ADR Local Rule 6-5 within which to request an extension of a deadline for mediation and grant this request to extend the deadline for mediation in this matter to July 31, 2011.

IT IS SO STIPULATED.

Dated: April 27, 2011

WINSTON & STRAWN LLP

By:                   /s/ Laura Guillen                  

LAURA GUILLEN  
Attorneys for  
ENRIQUETA MENDOZA

Dated: April \_\_, 2011

BURNHAM BROWN

By:                   

JACK SCHWARTZ, JR.  
Attorneys for  
STEVENSON ENTERPRISES

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Dated: April \_\_, 2011

ROBERTS & ELLIOT, LLP

By: \_\_\_\_\_  
JAMES ROBERTS  
SHARMI PAREKH SHAH  
Attorneys for  
HAK CHON LEE AND JEUM SOON LEE

Dated: April \_\_, 2011

ROBERT KINGSBURY LANE, INC.

By: \_\_\_\_\_  
ROBERT KINGSBURY LANE  
Attorney for  
HYSL, INC. AND YONG W. LEE

I, Laura Guillen, hereby attest, pursuant to N.D. Cal. General Order No. 45, that the concurrence to the filing of this document has been obtained from each signatory hereto.

\_\_\_\_\_  
*/s/ Laura Guillen*  
Laura Guillen

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Dated: April \_\_, 2011

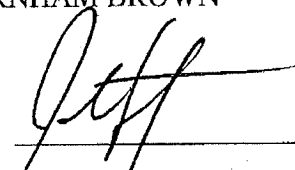
WINSTON & STRAWN LLP

By: \_\_\_\_\_

LAURA GUILLEN  
Attorneys for  
ENRIQUETA MENDOZA

Dated: April 27, 2011

BURNHAM BROWN

By:  \_\_\_\_\_

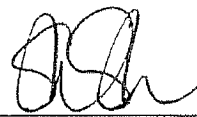
JACK SCHWARTZ, JR.  
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Dated: April 26, 2011

ROBERTS & ELLIOT, LLP

By:   
\_\_\_\_\_  
JAMES ROBERTS  
SHARMI PAREKH SHAH  
Attorneys for  
HAK CHON LEE AND JEUM SOON LEE

Dated: April \_\_, 2011

ROBERT KINGSBURY LANE, INC.

By: \_\_\_\_\_  
ROBERT KINGSBURY LANE  
Attorney for  
HYSL, INC. AND YONG W. LEE

I, Laura Guillen, hereby attest, pursuant to N.D. Cal. General Order No. 45, that the concurrence to the filing of this document has been obtained from each signatory hereto.

\_\_\_\_\_  
Laura Guillen

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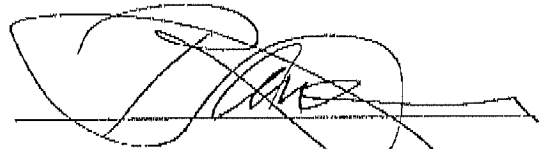
Dated: April \_\_, 2011

ROBERTS & ELLIOT, LLP

By: \_\_\_\_\_  
JAMES ROBERTS  
SHARMI PAREKH SHAH  
Attorneys for  
HAK CHON LEE AND JEUM SOON LEE

Dated: April <sup>27</sup> \_\_, 2011

ROBERT KINGSBURY LANE, INC.

By:  \_\_\_\_\_  
ROBERT KINGSBURY LANE  
Attorney for  
HYSI, INC. AND YONG W. LEE

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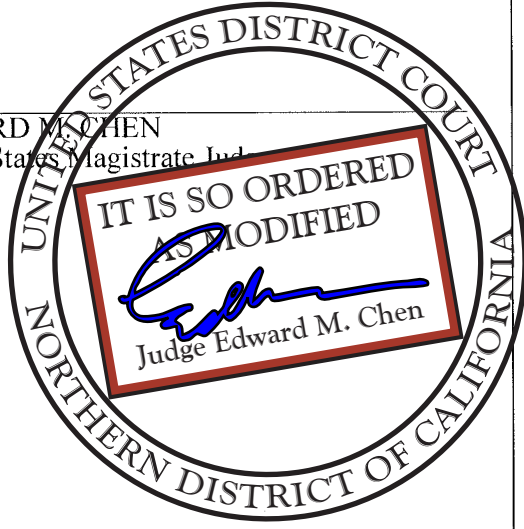


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**IT IS SO ORDERED.** The request to shorten time is GRANTED and the request to extend the deadline for mediation is GRANTED. The parties shall complete a mediation in this matter on or before July 31, 2011. The status conference is reset from May 18, 2011 at 2:30 p.m. to August 10, 2011 at 2:30 p.m.. An updated joint status report shall be filed by August 3, 2011.

Dated: April 28, 2011

EDWARD M. CHEN  
United States Magistrate Judge



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