

1 ERIC C. BELLAFRONTO, Bar No. 162102  
 ebellafronto@littler.com  
 2 SUZANNE R. NESTOR, Bar No. 217984  
 snestor@littler.com  
 3 LITTLER MENDELSON  
 A Professional Corporation  
 4 50 W. San Fernando, 15th Floor  
 San Jose, CA 95113.2303  
 5 Telephone: 408.998.4150

6 Attorneys for Defendant  
 NEW UNITED MOTOR MANUFACTURING,  
 7 INC. (erroneously sued herein as NEW UNITED  
 MOTORS CORP.)  
 8

9 AARON PAUL SILBERMAN  
 asilberman @rjop.com  
 10 ROGERS JOSEPH O'DONNELL & PHILLIPS  
 311 California Street  
 11 San Francisco, CA 94104

12 Telephone: 415.956.2828  
 SPECIAL MEDIATION COUNSEL FOR  
 13 PLAINTIFF BERNADETTE LEWIS

14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA  
 16 SAN FRANCISCO DIVISION

17 BERNADETTE LEWIS,  
 18 Plaintiff,

19 v.

20 NEW UNITED MOTORS CORP.,  
 21 Defendants.

Case No. C 09-00869 JCS

**STIPULATION AND ORDER  
 CONTINUING EARLY NEUTRAL  
 EVALUATION DEADLINE**

Judge: Joseph C. Spero

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 23 Pursuant to Federal Rules of Evidence 15(a)(3) and 16(b)(4), Plaintiff Bernadette  
 24 Lewis and Defendant New United Motor Manufacturing, Inc. hereby stipulate and agree as follows:

25 WHEREAS, Plaintiff and Defendant have agreed that it is in the interest of both  
 26 parties to conserve both the Parties' and the Court's resources and attempt to resolve the matter  
 27 through early Mediation;

1 WHEREAS, pursuant to the Court's Order requiring the Parties to complete  
2 Mediation by April 29, 2011, Counsel made all diligent efforts to schedule Mediation session with  
3 the assigned mediator, Sue Stott, Esq., for a date prior to the April 29, 2011 deadline. Due to  
4 calendar conflicts, however, the Parties were unable to do so;

5 WHEREAS, the Parties have agreed to participate in a Mediation on May 18, 2011,  
6 the earliest date on which all party representatives, counsel, and the evaluator are available;

7 **NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE,**  
8 and based on the foregoing circumstances, request that the Court establish the following modified  
9 deadlines:

- 10 • Parties to complete Mediation by May 18, 2011;
- 11 • All prior modifications, if any, to the Scheduling to remain in effect unless  
12 ordered otherwise.

13  
14 Dated: March 18, 2011

\_\_\_\_\_/s/\_\_\_\_\_  
 ERIC C. BELLAFRONTO  
 LITTLER MENDELSON, APC  
 Attorneys for Defendant NEW UNITED MOTOR  
 MANUFACTURING, INC. (erroneously sued herein  
 as NEW UNITED MOTORS CORP.)

15  
16  
17  
18 Dated: March 18, 2011

\_\_\_\_\_/s/\_\_\_\_\_  
 AARON PAUL SILBERMAN  
 Special Mediation Counsel for Plaintiff  
 BERNADETTE LEWIS

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21  
22 GOOD CAUSE APPEARING THEREFORE, IT IS SO ORDERED.

23  
24 Dated: March 21, 2011

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 JOSEPH C. SPERO  
 United States

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26 Firmwide:100676114.1 048320.1055

