

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

HASAN & ASSOCIATES, PC
Ghassan O. Hasan, Esq. #226491
One Park Plaza, Suite 600
Irvine, California 92614
Tel: (949) 833-7199
Fax: (949) 833-7197

Attorneys for Plaintiffs, KAREEM RASHEED and KHALID ANWARI

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

KAREEM RASHEED, a minor by and
through his guardian ad litem, and
KHALID ANWARI, a minor by and
through his guardian ad litem

PLAINTIFFS,

vs.

THE CITY OF SAN RAMON, a public
entity, SAN RAMON POLICE
DEPARTMENT, a public entity, OFFICER)
M. GUNNING, an individual, OFFICER)
STEPHENS, an individual, OFFICER R.)
RANSOM, an individual, OFFICER A.)
MEDINA, an individual, and DOES 1-20,)
inclusive,)
Defendants.)

CASE NO. C09-02011 MEJ
JOINT STIPULATION FOR
CONTINUANCE OF ADR
COMPLETION DATE
AND ~~(PROPOSED)~~ ORDER

**TO THIS HONORABLE COURT, ALL PARTIES AND/OR THEIR ATTORNEYS
OF RECORD HEREIN:**

Plaintiffs, KAREEM RASHEED and KHALID ANWARI (hereinafter collectively referred
to as "Plaintiffs"), and Defendant, CITY OF SAN RAMON, by and through their counsel of record
herein, hereby stipulate and agree, as follows:

1 **IT IS HEREBY STIPULATED AND AGREED** by and between all parties and their
2 counsel of record in the above-captioned matter that the currently scheduled ADR completion date
3 of December 16, 2009 should be postponed and continued at least 90 days or as soon thereafter as
4 the Court deems appropriate. This would be the first continuance of the ENE completion date, and
5 good cause exists for the Court to approve this continuance for the following reasons:

6 Plaintiffs' have discovered new information that requires the addition of new defendants who
7 are believed to be liable for Plaintiffs' injuries and damages at issue in this case. The process of
8 bringing in these new defendants will not be completed before the current ENE completion date.
9 Thus, a continuance will allow Plaintiff to complete the process of bringing in these new defendants
10 so that all relevant parties can participate in a meaningful and comprehensive ADR process where all
11 claims and issues can be addressed. In addition, the parties need additional time to perform
12 discovery from any of these newly added parties prior to any ENE session. The ENE evaluator in
13 this matter, Mr. Saltiel, is in agreement with this approach per prior telephone conferences with all
14 parties.

15
16 **IT IS SO STIPULATED**

17
18
19 DATE: November 13, 2009

HASAN & ASSOCIATES, PC

20
21 By: 

Ghassan O. Hasan, Esq.
Attorneys for Plaintiffs

22
23
24
25 DATE: November 13, 2009

**MCNAMARA, DODGE, NEY, BEATTY,
SLATTERY, PFALZER, BORGES & BROTHERS, LLP**

26
27 By: 

Noah G. Blechman, Esq.
Attorneys for Defendant, CITY OF SAN RAMON

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

The Court having considered the joint stipulation of the parties, as set forth above, and good cause appearing therefore, **IT IS HEREBY ORDERED** as follows:

(1) The ADR completion date in this matter is continued to March 19, 2009.

(2) Per the Court's Notice of Reassignment Order (Document 18, Filed 10-19-09), the parties are ordered to file a joint case management and status report within 14 days of completing the ENE.

IT IS SO ORDERED

DATE: November 18, 2009



CHIEF MAGISTRATE JUDGE MARIA-ELENA JAMES
U.S. DISTRICT COURT