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14 Attorneys for Defendants  
 AON BENFIELD INC. AND AON  
 15 SERVICE CORPORATION

16 UNITED STATES DISTRICT COURT  
 17 NORTHERN DISTRICT OF CALIFORNIA

19 MARIFI BAUTISTA,  
 20 Plaintiff,  
 21 vs.  
 22 AON BENFIELD, INC., AON SERVICE  
 CORPORATION, AON CORPORATION, and  
 23 DOES 1 through 100, inclusive,  
 24 Defendants.

No. C 09-03270 MHP

**JOINT STIPULATION AND  
~~PROPOSED~~ ORDER CONTINUING  
 DEADLINE FOR MEDIATION**

26 TO THE ABOVE-ENTITLED COURT:

27 The parties, through their respective counsel, hereby advise this Court, and stipulate, as  
 28 follows:

1 In accordance with Local Rule 6-2, Plaintiff Marifi Bautista (“Plaintiff”) and Defendants Aon  
2 Benfield Inc. and Aon Service Corporation (“Defendants”) hereby stipulate and jointly move this  
3 Court for a brief extension of the mediation completion deadline set by this Court. The Parties request  
4 that the mediation completion deadline previously set for March 31, 2010 be extended through April  
5 23, 2010.

6 As grounds for this motion the Parties state the following:

7 1. This is a claim for Employment Discrimination, Violation of the Equal Pay Act;  
8 Retaliation; Failure to Prevent Discrimination and Wrongful Termination related to Plaintiff’s  
9 employment with Defendants.

10 2. The first Case Management Conference in this case took place on November 23, 2009.  
11 At that Case Management Conference the Court ordered that private mediation in this case had to be  
12 completed by March 31, 2010 and that prior to this mediation the parties were limited to three  
13 depositions each and fifteen interrogatories and requests for production.

14 3. Discovery is actively underway. Plaintiff and Defendants have propounded written  
15 discovery to each other and will begin scheduling depositions shortly.

16 4. Defendants’ counsel, Erica Kelley, has a trial scheduled in Contra Costa County  
17 beginning on March 18, 2010, which is anticipated to be three to four weeks in length..

18 5. Given Defense counsel’s unavailability at the end of March and early April, the Parties  
19 do not believe they will be able to complete a meaningful mediation before the Court’s deadline.

20 6. The parties have a mediation scheduled with Michael J. Loeb for April 23, 2010.

21 7. The Parties therefore request that the Court grant the Parties a brief extension to this  
22 deadline, with the new deadline by which mediation must be completed as April 23, 2010.

23 8. This is the first request for an extension to any deadline in this case.

24 9. The only other date scheduled by the Court in this case is a further Case Management  
25 Conference on April 26, 2010. This date will not need to be changed as the parties will have  
26 completed the mediation prior to this date.

27 10. Since both Parties stipulate to and join this motion, no party is prejudiced by this  
28 extension.

1 Accordingly, the Parties respectfully request that the Court grant the Parties' Stipulation and  
2 Joint Motion to extend the mediation deadline.

3  
4 DATED: March 10, 2010

ADAMS | NYE | TRAPANI | BECHT LLP

5  
6 By: //s// Michael Sachs  
7 MICHAEL SACHS  
8 Attorneys for Plaintiff  
9 MARIFI BAUTISTA

10 DATED: March 10, 2010

LITTLER MENDELSON  
A Professional Corporation

11  
12 By: //s// Erica H. Kelley  
13 MICHELLE B. HEVERLY  
14 ERICA H. KELLEY  
15 Attorneys for Defendants  
16 AON BENFIELD INC. AND AON  
17 SERVICE CORPORATION

18 **ORDER**

19 PURSUANT TO STIPULATION, IT IS SO ORDERED.

20 Dated: 3/11, 2010

21 The Honorable  
22 United States

