

FILED

2010 FEB 26 PM 5:32

CLERK OF DISTRICT COURT  
U.S. DISTRICT COURT  
SAN FRANCISCO, CA

1 LISA M. GOODWIN (PRO SE)  
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4 (510) 790-4817  
5 Plaintiff

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17 Attorneys for Defendants

18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA  
20 SAN FRANCISCO DIVISION

21 LISA M. GOODWIN, )  
22 Plaintiff, )  
23 v. )  
24 JOHN E. POTTER, POSTMASTER )  
25 GENERAL UNITED STATES POSTAL )  
26 SERVICE )  
27 Defendant. )

No. C-09-05080 VRW

STIPULATION TO EXTEND TIME FOR  
DEFENDANT TO FILE RESPONSIVE  
PLEADING AND CONTINUE INITIAL  
CASE MANAGEMENT CONFERENCE

28 The plaintiff Lisa Goodwin, ("Plaintiff") and the federal defendant John Potter,  
Postmaster General United States Postal Service ("Defendants") stipulate to the following:

WHEREAS Plaintiff filed her complaint in the above-captioned action on October 29,  
2009, but did not serve the United States Attorney's Office until December 29, 2009;

WHEREAS, pursuant to Rule 12(a)(3)(A) and (B) of the Federal Rules of Civil  
Procedure, the United States or its officers or agencies have sixty (60) days after service upon the  
U.S. Attorney to file an answer or other response to a complaint, and accordingly the responsive

1 pleading and/or answer is due on March 1, 2010;

2 WHEREAS, the Defendant has requested an additional thirty days to prepare a responsive  
3 pleading and/or answer due to the unavailability of agency counsel, who must provide necessary  
4 information to prepare a response;

5 WHEREAS, the Plaintiff filed a Motion to Appoint An Attorney to Represent Plaintiff  
6 (“Motion to Appoint Counsel”) on February 10, 2010, and that motion is set for hearing on May  
7 6, 2010;

8 WHEREAS, the initial case management conference in this case is currently scheduled  
9 for April 1, 2010 at 3:30 p.m., and Plaintiff has expressed a desire to have assistance in the  
10 preparation of the Joint Case Management Statement, and sufficient time to review the  
11 responsive pleading and or answer prior to filing such statement;

12 ACCORDINGLY, the Plaintiff and Defendant (collectively “the parties”) agree and  
13 stipulate as follows:

14 The Defendant shall be allowed an additional thirty days to file a responsive pleading and  
15 or answer, which shall be filed no later than March 31, 2010. The parties further request and  
16 stipulate that the initial case management conference be set for a date after the Court rules on the  
17 Plaintiff’s Motion to Appoint Counsel, which is currently scheduled for May 6, 2010.

18 So Stipulated.

19 DATED: February 24, 2010

Respectfully submitted,

20 JOSEPH P. RUSSONIELLO  
21 United States Attorney

22 /s/ Melissa Brown

23 MELISSA K. BROWN  
Assistant United States Attorney

24 DATED: February 24, 2010

25 LISA M. GOODWIN

26 /s/Lisa M. Goodwin

27 LISA M. GOODWIN  
28 Plaintiff (*Pro se*)

**[PROPOSED] ORDER**

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Pursuant to the stipulation of the parties, the Defendant shall have until March 31, 2010 to file a responsive pleading and/or answer. ~~Further,~~ the Initial Case Management Conference ~~currently scheduled in this case for April 1, 2010 at 3:30 p.m. is continued until after the Court rules on Plaintiff's Motion to Appoint Counsel, which is currently scheduled for May 6, 2010.~~ *shall be*

IT IS SO ORDERED

Dated: 2/26/2010

HON. VAUGHN R. WALKER  
United States District Court Judge