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 6 Attorneys for Defendant  
 WALGREEN CO.

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 8 **UNITED STATES DISTRICT COURT**  
 9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

10 JANET ZHANG, ) Case No. 3:09-CV-05921-JSW  
 11 )  
 Plaintiff, )  
 12 ) **STIPULATION AND [PROPOSED]**  
 v. ) **ORDER TO EXTEND ADR DEADLINE**  
 13 )  
 WALGREEN CO., a corporation; and DOES )  
 14 1 through 20, )  
 )  
 15 Defendants. )  
 )  
 16 )

17 Plaintiff Janet Zhang and Defendant Walgreen Co. (hereinafter referred to as the  
 18 “Parties”) hereby stipulate by and through their counsel of record, David Depolo and Brian Crone  
 19 respectively, to extend the current deadline to complete ADR session from July 5, 2010 to July  
 20 16, 2010. The Parties’ stipulation is based on the following:

- 21 1. On or about March 5, 2010, the Court ordered the Parties to submit the matter to the  
 22 agreed upon form of ADR – mediation – and provided that the “Deadline for ADR session” was  
 23 “120 days from the date of this Order,” which would be July 5, 2010.
- 24 2. On or about March 31, 2010, the Court provided to the Parties a Notice of Appointing  
 25 Kristen Maloney as mediator.
- 26 3. On April 12, 2010, the Parties held an initial mediation conference with Ms. Maloney to,  
 27 among other items, select a mediation date.

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1 4. As a result of counsel for Defendant Walgreen Co.'s ("Walgreens") current trial schedule,  
2 the Parties initially attempted to schedule the deposition for mid-June 2010. Walgreens' client  
3 representative was unavailable for the dates selected in mid-June as well as Ms. Zhang (who is  
4 traveling from out of the country to attend the mediation).

5 5. Due to the various schedule conflicts, the first date that the Parties and their counsel are  
6 available for mediation is July 14, 2010. The Parties have tentatively scheduled the mediation for  
7 this date with the mediator and seek relief from the Court's Order requiring completion of the  
8 mediation by July 5, 2010.

9 A trial date of February 28, 2010 has been set in this case. There is no further case  
10 management conference. Per Court Rule 6-1(a):

11 The Parties may stipulate in writing, without a Court order, to . . . enlarge or  
12 shorten the time in matters not required to be filed or lodged with the Court,  
13 provided the change will not alter the date of any event or any deadline already  
fixed by the Court Order.

14 Since no deadlines are affected by enlarging the time in which the Parties can complete  
15 mediation, the Parties are filing this Stipulation pursuant to Local Rule 5.

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17 DATED: May 6, 2010

BERRY & BLOCK LLP

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By /s/ Brian S. Crone, Esq.  
BRIAN S. CRONE  
Attorneys for Defendants  
WALGREEN CO.

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DATED: May 4, 2010

DONNELLY NELSON DEPOLO & MURRAY

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By /s/ David Depolo, Esq.  
DAVID DEPOLO  
Attorneys for Plaintiff  
JANET ZHANG

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IT IS HEREBY ORDERED that the deadline for the Parties to complete mediation in this matter is extended from July 5, 2010 to July 16, 2010.

IT IS SO ORDERED.

Dated: May 6, 2010

  
Honorable Jeffrey S. White