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8 Attorneys for Federal Defendant

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION

12 THERESA M. O'BRIEN)
)
 13 Plaintiff,)
)
 14 v.)
)
 15 JANET NAPOLITANO, SECRETARY,)
 DEPARTMENT OF HOMELAND)
 16 SECURITY,)
)
 17 Defendant.)

Case No. CV 10-1830 EDL

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND ALTERNATIVE
 DISPUTE RESOLUTION DEADLINE**

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1 The parties jointly request that the deadline for the parties to mediate this matter be
2 extended by 60 days. The parties offer this joint stipulation in support of their request.

3 WHEREAS, the Court ordered for mediation to occur by January 10, 2011, or as soon
4 thereafter as convenient to the assigned mediator;

5 WHEREAS, no extensions of time have been granted thus far to mediate this case;

6 WHEREAS, the parties agreed for mediation to take place before the assigned mediator
7 Jacqueline Corley on January 10, 2011;

8 WHEREAS, the parties have engaged in settlement communications in advance of the
9 mediation and discussed possible ways to resolve the matter;

10 WHEREAS, the parties now require further information from one another to explore a
11 potential resolution along the lines discussed, but such information cannot be provided and
12 assessed prior to the originally scheduled mediation date of January 10, 2011;

13 WHEREAS, the parties jointly believe that the prospect of having a successful mediation
14 will be greater if the parties first have the opportunity to produce and assessed the desired
15 information;

16 WHEREAS, the mediator, Jacqueline Corley, has communicated to the parties that she
17 concurs with this approach of delaying the mediation so that the parties are optimally prepared to
18 conduct a meaningful mediation; and

19 WHEREAS, the parties believe that they will have sufficient information and time to
20 assess that information to conduct the mediation by March 11, 2011, or as soon thereafter as is
21 convenient to the mediator:

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23 The parties stipulate that the deadline to mediate the case shall be extended by 60 days, to
24 March 11, 2011, or as soon thereafter as is convenient to the mediator.

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It is so stipulated, through counsel of record.

DATED: January 5, 2011

Respectfully submitted,
MELINDA HAAG
United States Attorney

/s/
THOMAS R. GREEN
Assistant United States Attorney

DATED: January 5, 2011

/s/
LISA MAK
Attorney for Plaintiff

ORDER

The case management schedule is revised to reflect that the deadline to mediate this case shall be extended by 60 days, to March 11, 2011, or as soon thereafter as is convenient to the mediator.

IT IS SO ORDERED.

Dated: January 7, 2011

Elizabeth D. Laporte
ELIZABETH D. LAPORTE
United States Magistrate Judge