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13 Attorneys for Plaintiff
14 NAZAL SADIQ

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 NAZAL SADIQ, individually, and on
19 behalf of all persons similarly situated,

20 Plaintiff,

21 v.

22 CPC LOGISTICS, INC., and DOES
23 1 through 10, inclusive,

24 Defendant.

Case No. CV 10-02356 EDL

**STIPULATION TO EXTEND EARLY
NEUTRAL EVALUATION DEADLINE
AND [PROPOSED] ORDER**

Ctrm., Fl.: E, 15th

Judge: Hon. Elizabeth D. Laporte

Compl. Filed: April 30, 2010

1 Pursuant to Northern District A.D.R. Local Rule 5-5, Plaintiff NAZAL SADIQ
2 (“Plaintiff”) and Defendant CPC LOGISTICS, INC. (“Defendant”) (collectively, “the Parties”),
3 hereby stipulate to request an extended deadline to complete Early Neutral Evaluation of the
4 instant case. This stipulation is based on the following:

5 **1. REASONS FOR THE PROPOSED EXTENSION**

- 6 a. The Parties are currently bound to a November 18, 2010 deadline to complete
7 Early Neutral Evaluation.
- 8 b. The Parties have engaged in informal information exchange in an attempt to focus
9 the issues of the case. As a result of this exchange, Plaintiff now intends to
10 amend the operative complaint to comport with the Parties’ findings.
- 11 c. George Harris, the Evaluator selected for the case, will be out of the country for
12 several weeks just preceding the Parties’ deadline, such that the Evaluation
13 session will currently need to be held in late October as a practical matter.
- 14 d. Because the case is still at the pleading stage, and it is unlikely the Parties will be
15 able to complete sufficient investigation of the case such that a meaningful
16 evaluation can take place before the current deadline, they seek this extension.

17 **2. THE PARTIES CONCUR ON THE PROPOSAL**

- 18 a. At the initial conference call with the Evaluator on September 8, 2010, the Parties
19 agreed that extending the Evaluation deadline would lead to a more meaningful
20 Evaluation session. The Evaluator agreed that this extension would be beneficial.

21 **3. THE PROPOSED EXTENSION**

- 22 a. The Parties seek to extend the Early Neutral Evaluation deadline sixty (60) days,
23 to January 17, 2011.

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1 **IT IS SO STIPULATED.**

2 Dated: September 10, 2010

HOFFMAN EMPLOYMENT LAWYERS LLP

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5 MICHAEL HOFFMAN
Attorneys for Plaintiffs
6 NAZAL SADIQ, ET AL.

7 Dated: September 10, 2010

LITTLER MENDELSON, P.C.

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10 RICHARD H. RAHM
Attorneys for Defendant
11 CPC LOGISTICS, INC.

(by Plaintiff's counsel with
authorization)

12
13 **[PROPOSED] ORDER**

14 The Stipulation of the Parties is hereby adopted by the Court as setting the parties' Early
15 Neutral Evaluation deadline as January 17, 2011.

16 **PURSUANT TO STIPULATION, IT IS HEREBY ORDERED.**

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19 DATED: 9/15/10

