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

18 GEORGE WALTER TITUS by and ,)
19 through his successor-in-interest LUCIE)
TITUS and LUCIE TITUS, individually,)

20 Plaintiffs,)

21 v.)

22)
23 UNITED STATES DEPARTMENT OF)
24 VETERANS AFFAIRS, VETERANS)
AFFAIRS NORTHERN CALIFORNIA)
25 HEALTH CARE SYSTEM)
(VAN CHS C), CENTER for,)
26 REHABILITATION & EXTENDED)
CARE(Martinez), MATTHEW TITUS as)
27 a nominal defendant,)

28 Defendants.)

No. C 10-02795-SI (DMR)

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO
COMPLETE ADR PROCEDURES**

1 The parties hereby jointly stipulate and request that the Court grant an extension of time
2 to complete the alternative dispute resolution procedures in this case. This request is based upon
3 the following:

4 1. This Court's Scheduling Order dated November 15, 2010, notes that the
5 settlement conference "shall occur during the first week in March 2011."

6 2. The parties have exchanged significant written discovery and have concluded
7 several depositions, however, certain key depositions remain to be taken in order for the parties
8 to properly evaluate this case for settlement.

9 3. The parties currently are scheduled to appear at a settlement conference before
10 Magistrate Judge Ryu on March 4, 2011. The parties are unable to complete the depositions
11 before this date.

12 4. Magistrate Judge Ryu's clerk has indicated that the Magistrate has
13 March 17, 2011 available to conduct a settlement conference in this case. The date is acceptable
14 to the parties and would allow the depositions to be completed in time to have the information
15 included for a proper evaluation of this case.

16 Accordingly, the parties do hereby stipulate, agree and request that the Court Order that
17 the parties shall have until March 17, 2011 to complete the Settlement Conference in this case.

18 Respectfully submitted,

19 LAW OFFICES OF
20 SANFORD I. HOROWITZ

MELINDA HAAG
United States Attorney

21 Dated: February 28, 2011


22 /s/
SANFORD I. HOROWITZ
Attorneys for Plaintiffs

/s/
ABRAHAM A. SIMMONS
Assistant United States Attorney

23 **[PROPOSED] ORDER**

24 It is so **Ordered**. The time within which the parties must complete the settlement
25 conference in this case is extended to March 17, 2011.

26
27
28 Dated: 3/1/11



HONORABLE SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE