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                              UNITED STATES DISTRICT COURT
                            NORTHERN DISTRICT OF CALIFORNIA
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   MID CENTURY INSURANCE COMPANY,
                                                  Docket No. CV-10-3221 EMC
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                       Plaintiff,
                                                  STIPULATION AND [PROPOSED]
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                                                   ORDER CONTINUING ADR
   v.
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                                                   COMPLETION DATE AND FURTHER
   UNITED STATES DEPARTMENT OF
                                                   CASE MANAGEMENT CONFERENCE
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   AGRICULTURE,
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                       Defendant.
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   IT IS HEREBY STIPULATED by and between the parties hereto, that
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    1. Counsel for Defendant was recently assigned as co-trial counsel in another matter in which fact
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   discovery closes on May 2, 2011. The plaintiff's deposition in that matter has been scheduled for
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   April 7, 2011, and it conflicts with the April 7, 2011 mediation date set in this matter.
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   STIPULATION AND [PROPOSED] ORDER CONTINUING
    ADR COMPLETION DATE AND FURTHER CMC
   Mid Century Ins. Co. v. USDA, CV-10-3221 EMC
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2. The ADR Completion date in this matter is currently April 13, 2011. 3. The parties and mediator have agreed to reschedule the mediation to May 17, 2011, subject to the Court's continuance of the ADR completion date. 3 4. The Further Case Management Conference in this matter is set for April 20, 2011 at 2:30 pm. 4 5 5. The Court has not previously continued the ADR completion date in this matter. The Court granted one extension of the Initial Case Management Conference ("ICMC") because, as result of a delay in service, the answer to the complaint was not due until after the ICMC. 7 6. The parties therefore request an Order from the Court continuing the ADR Completion deadline 8 from April 13, 2011 to May 25, 2011, and continuing the Further Case Management Conference to 10 May 25, 2011 at 1:30pm with the Further Joint Case Management Statement due on May 18, 2011. 11 DATED: March 28, 2011 12 SUSAN M. BENSON & ASSOCIATES LLP 13 /S/ 14 SUSAN M. BENSON 15 Attorneys for Mid-Century 16 DATED: March 28, 2011 MELINDA L. HAAG 17 United States Attorney 18 /S/19 JUAN D. WALKER 20 Special Assistant United States Attorney Attorneys for Federal Defendant 21 22 [PROPOSED] ORDER 23 Pursuant to stipulation, IT IS SO ORDERED. IT IS <u>SO</u> ORDERED 25 DATED: 26 United State 27 Judge Edward M. Chen 28 STIPULATION AND [PROPOSED] ORDER CONTINUIN ADR COMPLETION DATE AND FURTHER CMC 2 Mid Century Ins. Co. v. USDA, CV-10-3221 EMC