

1 PAUL L. REIN, Esq. (SBN 43053)
 CELIA MCGUINNESS, Esq. (SBN 159420)
 2 CATHERINE M. CABALO, Esq. (SBN 248198)
 LAW OFFICES OF PAUL L. REIN
 3 200 Lakeside Drive, Suite A
 Oakland, CA 94612
 4 Telephone: 510/832-5001
 Facsimile: 510/832-4787

5 Attorneys for Plaintiff
 6 BONNIE REGINA

7 ERICK C. TURNER, State Bar No. 236186
 BERRY & BLOCK LLP
 8 2150 River Plaza Drive, Suite 415
 Sacramento, CA 95833
 9 (916) 564-2000
 (916) 564-2024 fax

10 Attorneys for Defendants
 11 COLBY STREET MEDICAL CENTER, LLC
 and CARDOZA PROPERTIES, INC.

12 CLAUDIA A. QUIROZ (SBN 254419)
 13 K&L GATES LLP
 Four Embarcadero Center, Suite 1200
 14 San Francisco, CA 94111
 Telephone: 415.882.8200
 15 Facsimile: 415.882.8220

16 Attorneys for Defendant
 LABORATORY CORPORATION OF AMERICA

18 IN THE UNITED STATES DISTRICT COURT
 19 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

20 BONNIE REGINA,
 21 Plaintiff,
 v.

Case No. C10-05955 CRB
Civil Rights

22 COLBY STREET MEDICAL
 23 CENTER, LLC; LABORATORY
 CORPORATION OF AMERICA;
 24 CARDOZA PROPERTIES, INC.; and
 DOES 1-10, Inclusive,
 25 Defendants.

**STIPULATION REQUESTING AN
 EXTENSION OF DEADLINE TO
 FILE NOTICE OF NEED FOR
 MEDIATION; [REDACTED] ORDER**

26 _____/
 27 Plaintiff BONNIE REGINA (“Plaintiff”) and Defendants COLBY
 28 STREET MEDICAL CENTER, LLC, LABORATORY CORPORATION OF

1 AMERICA and CARDOZA PROPERTIES, INC. (together sometimes
2 “Defendants”), by and through their respective counsel, jointly stipulate and
3 request through their attorneys of record as follows:

4 This case involves alleged violations of the ADA and pendant state
5 law claims at a multi-story medical building, and is currently governed by the
6 procedures of General Order 56. The parties have been working cooperatively
7 toward settlement of plaintiff’s claims for injunctive relief. To that end and in
8 accordance with General Order 56, the parties conducted an extensive cooperative
9 joint site inspection of the subject premises on April 18, 2011.

10 The parties “met and conferred” at the site inspection, and are
11 awaiting the resulting draft report from plaintiff’s expert so that the parties can
12 continue working toward a barrier removal agreement. As plaintiff’s expert is
13 currently out of state on a family matter, and will not return until May 20th,
14 plaintiff expects her expert’s draft report to be provided to defendants by the end
15 of May.

16 Accordingly, and to provide an opportunity for the parties to attempt
17 settlement of the injunctive relief issues prior to requesting the assistance of a
18 mediator, the parties stipulate in requesting that the date for filing a Notice of
19 Need for Mediation pursuant to General Order 56 be extended from June 2, 2011
20 (45 days after the inspection) to July 1, 2011.

21

22 **IT IS SO STIPULATED.**

23

24 Dated: May 12, 2011

LAW OFFICES OF PAUL L. REIN

25

26

/s/ Paul L. Rein

PAUL L. REIN, Esq
Attorneys for Plaintiff
BONNIE REGINA

27

28

1 Dated: May 19, 2011

K & L GATES, LLP

2

3

/s/ Claudia Quiroz

4

CLAUDIA A. QUIROZ, Esq.
Attorneys for Defendant
LABORATORY CORPORATION
OF AMERICA

5

6

7

8 Dated: May 19, 2011

BARRY & BLOCK LLP

9

10

/s/ Erick C. Turner

11

ERICK C. TURNER, Esq.
Attorneys for Defendants
COLBY STREET MEDICAL CENTER,
LLC, and CARDOZA PROPERTIES, INC.

12

13

14

15

ORDER

16

Good cause having been shown, the Court grants the parties’
17 stipulation and request to extend the General Order 56 deadline to file a “Notice
18 of Need for Mediation” from June 2, 2011 to July 1, 2011.

19

20 **IT IS SO ORDERED.**

21

22 Dated: May 25, 2011

Honorable
United States



23

24

25

26

27

28