1	MELINDA HAAG (CSBN 132612)
2	United States Attorney JOANN M. SWANSON (CSBN 88143)
3	Chief, Civil Division ANN MARIE REDING (CSBN 226864)
4	Assistant United States Attorney
5	450 Golden Gate Avenue, Box 36055 San Francisco, California 94102-3495
6	Telephone: (415) 436-6813 FAX: (415) 436-4378
7	annie.reding@usdoj.gov
8	Attorneys for Defendant
9	UNITED STATES DISTRICT COURT
10	NORTHERN DISTRICT OF CALIFORNIA
11	SAN FRANCISCO DIVISION
12	DOUGLAS W. JAMES, JR.,) No. C 11-2552 MEJ
13	Plaintiff,) STIPULATION AND [PROPOSED]
14) ORDER CONTINUING THE ADR
15	v.) DEADLINE) UNITED STATES OF AMERICA (United)
16	States Department of the Interior-San) Francisco Maritime National Historical)
17	Park),
18	Defendant.
19	Pursuant to Local Civil Rules 6-1 and 6-2, defendant United States of America
20	("Defendant") and plaintiff Douglas W. James, Jr. ("Plaintiff"), by and through their respective
21	counsel, hereby jointly and respectfully request that the Court continue the Alternative Dispute
22	Resolution (ADR) deadline in this matter to February 29, 2012. In accordance with Local Civil
23	Rule 6-2(a), this stipulation is supported by the Declaration of Ann Marie Reding and a proposed
24	order, which are filed herewith. The parties stipulate as follows:
25	1. On May 26, 2011, Plaintiff filed his Complaint in this case. <i>See</i> Docket No. 1.
26	 On August 25, 2011, the Court referred this case to mediation. <i>See</i> Docket No. 9.
27	 On Nugast 29, 2011, the Court referred tins case to mediate this case. On September 1, 2011, the Court appointed Joel Franciosa to mediate this case.
28	2. On September 1, 2011, the Court appointed soor Franciosa to mediate this ease.

STIPULATION AND [PROPOSED] ORDER CONTINUING ADR DEADLINE C 11-2552 MEJ 1

1

2

3

4

5

6

See Docket No. 10.

4. Based on ADR Local Rule 3-6, the deadline for the parties to mediate this case is ninety days from the Court's Order referring this case to mediation, or November 22, 2011. See Declaration of Ann Marie Reding ("Reding Decl."), ¶ 5.

5. On September 29, 2011, the parties participated in a conference call with Mr. Franciosa and agreed to a mediation date of December 19, 2011. See Reding Decl., ¶ 6.

7 6. On or about October 11, 2011, the parties agreed to depose Plaintiff on November 8 23, 2011. See id. at ¶ 7.

9 7. On or about November 8, 2011, counsel for Defendant informed Plaintiff's 10 counsel that she would like to obtain Plaintiff's medical records prior to his deposition and 11 believed it made sense to delay the deposition until after such time that the documents could be received. Counsel for Plaintiff was agreeable to continuing the deposition to a later date. See id. 12 13 at ¶ 8.

8. 14 Due to the parties' unavailability during the holidays, and in order to allow time for Defendant to limited discovery responses, as well as Plaintiff's medical records, the parties 15 16 have stipulated to a deposition date in January 2012 and will agree to mediation date before 17 March 31, 2012. *See id.* at ¶ 9.

18 19

21

22

///

///

9. No prior extensions of time have been requested or granted. See id. at ¶ 10. 10. The requested time modification will not impact any other deadline imposed by

20 Court. See id. at ¶ 11.

23 /// 24 /// 25 /// 26 ///

27 ///

///

28

STIPULATION AND [PROPOSED] ORDER CONTINUING ADR DEADLINE C 11-2552 MEJ 2

1	11. In light of the foregoing, the parties request that the Court continue the last day to
2	mediate this case until March 31, 2012.
3 4	DATED: November 21, 2011 Respectfully submitted,
5	
6	/s/ Rey Hassan REY HASSAN
7	Attorney for Plaintiff
8	DATED: November 21, 2011 Respectfully submitted, MELINDA HAAG
9 10	United States Attorney
11	/s/ Ann Marie Reding
12	ANN MARIE REDING Assistant United States Attorney
13	Attorneys for Defendant
14	
15	PROPOSED-ORDER
16	Plaintiff and Defendant's Stipulated Request to Continue the ADR deadline is hereby
17	GRANTED . The last day to mediate this case is continued until March 31, 2012.
18	Date: November 21, 2011
19	HON. MARY A- 4- MA JAMES United States Programmed Judge
20	
21	
22	
23	
24	
25	
26	
27	
28	
	STIPULATION AND [PROPOSED] ORDER CONTINUING ADR DEADLINE C 11-2552 MEJ 3