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 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,	)	<b>STIPULATION AND <del>PROPOSED</del></b>
	)	<b>ORDER CONTINUING THE ADR</b>
14 v.	)	<b>DEADLINE</b>
	)	
15 UNITED STATES OF AMERICA (United	)	
16 States Department of the Interior-San	)	
17 Francisco Maritime National Historical	)	
Park),	)	
	)	
18 Defendant.	)	

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 20 Pursuant to Local Civil Rules 6-1 and 6-2, defendant United States of America  
 21 (“Defendant”) and plaintiff Douglas W. James, Jr. (“Plaintiff”), by and through their respective  
 22 counsel, hereby jointly and respectfully request that the Court continue the Alternative Dispute  
 23 Resolution (ADR) deadline in this matter to February 29, 2012. In accordance with Local Civil  
 24 Rule 6-2(a), this stipulation is supported by the Declaration of Ann Marie Reding and a proposed  
 25 order, which are filed herewith. The parties stipulate as follows:

- 26 1. On May 26, 2011, Plaintiff filed his Complaint in this case. *See* Docket No. 1.
- 27 2. On August 25, 2011, the Court referred this case to mediation. *See* Docket No. 9.
- 28 3. On September 1, 2011, the Court appointed Joel Franciosa to mediate this case.

1 See Docket No. 10.

2 4. Based on ADR Local Rule 3-6, the deadline for the parties to mediate this case is  
3 ninety days from the Court's Order referring this case to mediation, or November 22, 2011.

4 See Declaration of Ann Marie Reding ("Reding Decl."), ¶ 5.

5 5. On September 29, 2011, the parties participated in a conference call with Mr.  
6 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  
12 received. Counsel for Plaintiff was agreeable to continuing the deposition to a later date. See *id.*  
13 at ¶ 8.

14 8. Due to the parties' unavailability during the holidays, and in order to allow time  
15 for Defendant to limited discovery responses, as well as Plaintiff's medical records, the parties  
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 9. No prior extensions of time have been requested or granted. See *id.* at ¶ 10.

19 10. The requested time modification will not impact any other deadline imposed by  
20 Court. See *id.* at ¶ 11.

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