

1 Valarie H. Jonas (SBN 137525)
 vjonas@murchisonlaw.com
 2 Alicia M. Gurries (SBN 210225)
 agurries@murchisonlaw.com
 3 **MURCHISON & CUMMING, LLP**
 275 Battery Street, Suite 550
 4 San Francisco, California 94111
 Telephone: (415) 524-4300
 5 Facsimile: (415) 391-2058

6 Attorneys for Defendants, T. ROWE PRICE
 GROUP, INC.; T. ROWE PRICE
 7 INVESTMENT SERVICES, INC.; T.
 ROWE PRICE SERVICES, INC.; T. ROWE
 8 PRICE TRUST COMPANY

9

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12

13 ASHLEY MORRISON,
 14 Plaintiff,
 15 vs.
 16 T. ROWE PRICE GROUP, INC.; T.
 ROWE PRICE INVESTMENT
 17 SERVICES, INC.; T. ROWE PRICE
 SERVICES, INC.; T. ROWE PRICE
 18 TRUST COMPANY; and DOES 1-10,
 19 Defendants.

CASE NO. 3:11-cv-02813-EMC
**STIPULATION TO SUBMIT
 MATTER TO PRIVATE
 MEDIATION AND CONTINUE
 MEDIATION DEADLINE;
 [PROPOSED] ORDER**
 Complaint Filed: May 6, 2011
 Trial Date: December 9, 2013

20

21 IT IS HEREBY STIPULATED by and between Plaintiff ASHLEY MORRISON
 22 (“MORRISON”) and Defendants T. ROWE PRICE GROUP, INC.; T. ROWE PRICE
 23 INVESTMENT SERVICES, INC.; T. ROWE PRICE SERVICES, INC.; T. ROWE
 24 PRICE TRUST COMPANY (collectively referred to herein as “T. ROWE PRICE”)
 25 through their designated counsel that this matter be submitted to private mediation with
 26 Robert J. Kaplan at Judicate West and that the mediation deadline be continued to
 27 November 6, 2013.

28

1 WHEREAS, on September 22, 2011, this Court appointed Mark F. Katz as the
2 mediator, Document 26.

3 The Parties have met and conferred and agree to the selection of a private mediator,
4 Robert J. Kaplan. The first available date for mediation with Mr. Kaplan is October 2013.
5 Based on Mr. Kaplan's availability and that of counsel, the parties have agreed to and
6 have scheduled mediation before Mr. Kaplan on October 23, 2013, in San Francisco.

7 The Parties agree that a private mediator is needed to deal with the complex legal
8 issues in this matter. Additional time is needed to allow the parties to complete limited
9 and necessary discovery and to provide defendants and their carrier representatives, who
10 will be traveling from Baltimore, Maryland and Southern California, the opportunity to
11 meaningfully participate in the mediation.

12 NOW THEREFORE IT IS HEREBY STIPULATED AND AGREED, by and
13 between the undersigned counsel for all parties, that:

14 Subject to approval of the Court, the Parties will submit this matter to private
15 mediation with Robert J. Kaplan on October 23, 2013. The deadline to complete
16 mediation will be continued to November 6, 2013 or such other date and time as the Court
17 shall order.

18 IT IS SO STIPULATED.

19 Dated: June 27, 2013

KAUFHOLD GASKIN LLP

/s/ Steven S. Kaufhold

Steven S. Kaufhold

Attorneys for Plaintiff ASHLEY MORRISON

25 Dated: June 27, 2013

MURCHISON & CUMMING, LLP

s/ Valarie H. Jonas

Valarie H. Jonas

Attorneys for Defendants, T. ROWE PRICE GROUP,

1 INC; T. ROWE PRICE INVESTMENT SERVICES,
2 INC.; T. ROWE PRICE SERVICES, INC.; T. ROWE
3 PRICE TRUST COMPANY
4

5 I, Valarie H. Jonas, am the ECF user whose identification and password are
6 being used to file the foregoing STIPULATION AND [PROPOSED] ORDER TO
7 SUBMIT THE MATTER TO PRIVATE MEDIATION AND CONTINUE THE
8 MEDIATION DEADLINE . In compliance with General Order 45, X.B., I hereby
9 attest that the above-referenced signatories to this stipulation have concurred in this
10 filing.

11 **ORDER**

12 Pursuant to stipulation of Plaintiff MORRISON and Defendants T. ROWE PRICE
13 and good cause existing therefore,

14 **IT IS HEREBY ORDERED** that this matter be submitted to private mediation
15 with Robert J. Kaplan. The mediation deadline will be continued to
16 November 6, 2013.

17 Dated: July _____, 2013

