

1 DAN SIEGEL, (SBN 56400)  
2 VYLMA L. ORTIZ, (SBN 188298)  
3 SIEGEL & YEE  
4 499 14th Street, Suite 220  
5 Oakland, CA 94612  
6 Telephone: (510) 839-1200  
7 Facsimile: (510) 444-6698

CATHY L. ARIAS (SBN 141989)  
RAYMOND A. GREEN (SBN 131510)  
BURNHAM BROWN  
P.O. Box 119  
Oakland, CA 94612  
Telephone: (510) 444-6800  
Facsimile: (510) 835-6666

6 Attorneys for Plaintiff  
7 MARTIN SCHULTER

Attorneys for Defendants  
BOARD OF TRUSTEES OF THE CSU, et al.

8  
9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**

12 MARTIN SCHULTER,  
13 Plaintiff,  
14 vs.

15 BOARD OF TRUSTEES OF THE  
16 CALIFORNIA STATE UNIVERSITY,  
17 DR. JASON LAKER, and DOES 1 through  
18 10, inclusive,  
19 Defendants.

) Case No. C-11-03094 JSW

) STIPULATION AND ~~PROPOSED ORDER~~  
) TO CONTINUE ADR COMPLETION  
) DATE TO AUGUST 31, 2012

) Honorable Jeffrey S. White  
) Trial Date: February 4, 2013

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21 IT IS HEREBY STIPULATED, by and between plaintiff, MARTIN SCHULTER,  
22 and defendants, BOARD OF TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY  
23 and DR. JASON LAKER, through their respective attorneys of record, that:


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25 1. The parties agree to continue the deadline to compete ADR to August 31, 2012.  
26 2. This continuation is necessary because plaintiff's attorney has a six week trial  
27 which began on April 24, 2012.  
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- 3. Furthermore, the agreement to a new date allows more time for depositions to be completed prior to the ADR mediation, which increases the likelihood that the matter will be resolved at that time.
- 4. The continuation of the ADR completion date will not prejudice either party.
- 5. The parties, therefore, respectfully request and stipulate that the ADR completion date of June 11, 2012, be continued to a date convenient to the Court's calendar, in late August 2012.
- 6. Both facsimile signatures and signatures in counterpart shall be considered as valid as an original signature for purposes of this Stipulation.

SIEGEL & YEE

Dated: May 1, 2012

By:   
 Vylma L. Ortiz  
 Attorneys for Plaintiff

BURNHAM & BROWN

Dated: May \_\_\_\_, 2012

By \_\_\_\_\_  
 Raymond Greene  
 Attorneys for Defendants

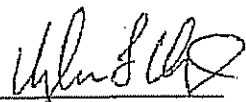
**SO ORDERED**

Dated: May \_\_\_\_, 2012


By \_\_\_\_\_  
 U.S. District Judge Jeffrey S. White

- 1 3. Furthermore, the agreement to a new date allows more time for depositions to be  
2 completed prior to the ADR mediation, which increases the likelihood that the  
3 matter will be resolved at that time.  
4  
5 4. The continuation of the ADR completion date will not prejudice either party.  
6  
7 5. The parties, therefore, respectfully request and stipulate that the ADR completion  
8 date of June 11, 2012, be continued to a date convenient to the Court's calendar,  
9 in late August 2012.  
10  
11 6. Both facsimile signatures and signatures in counterpart shall be considered as  
12 valid as an original signature for purposes of this Stipulation.

13 SIEGEL & YEE

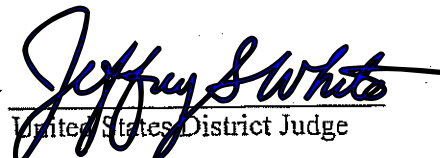
14 By   
15 Vylma L. Ortiz  
16 Attorneys for Plaintiff

17 BURNHAM & BROWN

18 By   
19 Raymond Greene  
20 Attorneys for Defendants

21  
22 **SO ORDERED**

23  
24 Dated: May 2, 2012

25  
26 By   
27 United States District Judge  
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