

1 Richard G. Grotch, Esq. – SBN 127713  
 2 Gina J. Beltramo, Esq. – SBN 203809  
**3 CODDINGTON, HICKS & DANFORTH**  
**A Professional Corporation, Lawyers**  
 4 555 Twin Dolphin Drive, Suite 300  
 Redwood City, CA 94065-2133  
 Telephone: (650) 592-5400  
 Facsimile: (650) 592-5027  
 5 E-mail: [rgrotch@chdlawyers.com](mailto:rgrotch@chdlawyers.com)

6 **ATTORNEYS FOR** Defendant  
 7 UNITED AIR LINES, INC.

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN FRANCISCO DIVISION

11 CHRISTINE ALLEN,  
 12 Plaintiff,  
 13 vs.  
 14 UNITED AIR LINES, INC., a Delaware  
 corporation; and DOE ONE through DOE  
 15 ONE HUNDRED, inclusive,  
 16 Defendants.

Case No. CV 11 3326 RS

STIPULATION FOR ORDER REGARDING  
 EXTENSION OF MEDIATION DEADLINE;  
 PERMISSION TO ENGAGE IN PRIVATE  
 MEDIATION; CONTINUANCE OF  
 FURTHER CASE MANAGEMENT  
 CONFERENCE; [~~PROPOSED~~] ORDER

18 WHEREAS the parties consented to mediation of this case and the Court entered an order  
 19 requiring the parties to mediate; and

20 WHEREAS the case was referred to court-annexed mediation and Eric Danoff, Esq. was  
 21 appointed to serve as the mediator; and

22 WHEREAS plaintiff's counsel has just advised defendant's counsel that plaintiff has an  
 23 additional surgery now scheduled to be performed on August 8, 2012, by Dr. Michael Dillingham;  
 24 and

25 WHEREAS plaintiff will likely contend the August 8, 2012 surgery was necessitated by  
 26 injuries she claims to have sustained in the September 18, 2010 incident that gives rise to this case;  
 27 and  
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1           WHEREAS additional time is now necessary in order for plaintiff to undergo and recover  
2 from the surgery, for physicians to assess her prognosis in light of the surgery and for the defendant  
3 to depose the surgeon regarding the surgery and the plaintiff's prognosis; and

4           WHEREAS counsel for the parties have conferred about the desirability of mediating this  
5 case with a retired judicial officer acting as the mediator; and

6           WHEREAS the parties have agreed that the Honorable Ellen Sickles James (ret'd), of JAMS,  
7 would be an appropriate mediator for this dispute; and

8           WHEREAS the mediation completion deadline (having previously been continued to  
9 facilitate medical examinations and investigation of the nature and extent of Medicare's priority right  
10 of recovery) is currently August 24, 2012; and

11           WHEREAS a further case management conference is currently scheduled for August 30,  
12 2012;

13           IT IS HEREBY STIPULATED, by and between the parties, through their respective  
14 counsel, that this Court be asked to issue an order:

- 15           1. Further extending the mediation completion deadline to and including October 26,  
16 2012;
- 17           2. Permitting the parties to engage in private mediation, with Judge Ellen James, at JAMS,  
18 serving as the mediator, instead of court-annexed mediation with mediator Eric Danoff, Esq.; and
- 19           3. Continuing the further case management conference to Thursday, November 1, 2012,  
20 at 10:00 a.m., in Courtroom 3 of this Court, located at 450 Golden Gate Avenue, San Francisco,  
21 California.

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1 IT IS SO STIPULATED.

2 Dated: July 23, 2012

CODDINGTON, HICKS & DANFORTH

3  
4 /s/ *Richard G. Grotch*

5 By: \_\_\_\_\_  
6 Richard G. Grotch (\*)  
7 Attorneys for Defendant  
8 UNITED AIR LINES, INC.

9 Dated: July 23, 2012

O'REILLY || COLLINS

10 /s/ *James P. Collins*

11 By: \_\_\_\_\_  
12 James P. Collins  
13 Attorneys for Plaintiff  
14 CHRISTINE ALLEN

15 (\*) I hereby attest that I have on file all holograph signatures  
16 for any signatures indicated by a "conformed" signature (/s/)  
17 within this e-filed document.

18 **[PROPOSED] ORDER**

19 Pursuant to the stipulation of the parties,

20 IT IS HEREBY ORDERED that:

21 1. The deadline by which the parties must complete the mediation process in this case  
22 shall be October 26, 2012;

23 2. The parties shall be permitted to engage in private mediation, with Judge Ellen James, at  
24 JAMS, serving as the mediator, instead of court-annexed mediation with mediator Eric Danoff, Esq.;

25 and

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1           3.     The further case management conference in this case shall be continued to Thursday,  
2 November 1, 2012, at 10:00 a.m., in Courtroom 3 of this Court, located at 450 Golden Gate Avenue,  
3 San Francisco, California.

4           IT IS SO ORDERED.

5     Dated: July 24, 2012

  
Honorable Richard Seeborg  
United States District Judge

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