

1 PAUL L. REIN, ESQ.
 CELIA MCGUINNESS, ESQ.
 2 CATHERINE M. CABALO, ESQ.
 LAW OFFICES OF PAUL L. REIN
 3 200 Lakeside Drive, Suite A
 Oakland, CA 94612
 4 T: 510/832-5001
 F: 510/832-4787

5 BRIAN GEARINGER, ESQ.
 6 GEARINGER LAW GROUP
 825 Van Ness Avenue, 4th Floor
 7 San Francisco, CA 94109-7837
 T: 415/440-3102
 8 F: 415/440-3103

9 Attorneys for Plaintiff TERRY COCHRELL

10 MARK J. ZEMBSCH
 CITY ATTORNEY'S OFFICE
 11 2180 Milvia Street, Fourth Floor
 Berkeley, CA 94704
 12 T: 510-981-6998
 F: 510-981-6960

13 Attorney for CITY OF BERKELEY

14 PETER P. EDRINGTON, Esq. (074355)
 15 JAMES M. MARZAN, Esq. (133931)
 EDRINGTON, SCHIRMER & MURPHY LLP
 16 2300 Contra Costa Boulevard, Suite 450
 Pleasant Hill, CA 94523-3936
 17 Telephone: (925) 827-3300
 Facsimile: (925) 827-3320

18 Attorneys for Defendant BERKELEY UNIFIED
 19 SCHOOL DISTRICT

20 UNITED STATES DISTRICT COURT
 21 NORTHERN DISTRICT OF CALIFORNIA

22 TERRY COCHRELL,)
)
 23 Plaintiff,)
)
 24 vs.)
)
 25 BERKELEY UNIFIED SCHOOL)
 DISTRICT; CITY OF BERKELEY; DOES 1)
 26 through 10, inclusive,)
)
 27 Defendants.)
)

CASE NO.: C11-03395 SI

**STIPULATION AND [PROPOSED]
 ORDER TO CONTINUE FURTHER
 CASE MANAGEMENT CONFERENCE**

1 Plaintiff TERRY COCHRELL and Defendants BERKELEY UNIFIED SCHOOL
2 DISTRICT and CITY OF BERKELEY, hereby jointly stipulate and request through their
3 attorneys of record that the Further Case Management Conference currently scheduled for August
4 24, 2012, be continued to September 28, 2012, to allow further settlement discussions among the
5 parties. This request is based on the following good cause:

- 6 1. The Court Ordered on June 22, 2012 that the parties return to mediation with
7 Mediator Howard Herman.
- 8 2. The parties have been working cooperatively in settlement discussions and have set a
9 mediation date of August 24, 2012, from 10 a.m. – 6:00 p.m. This was the only date
10 which accommodated all parties' schedules. It is the same date as the currently
11 scheduled Further Case Management Conference.
- 12 3. The parties will exchange mediation statements no later than August 17, 2012, the
13 same date the Case Management Conference statement is due.
- 14 4. Mediation on August 24, 2012, may change the posture of the case, or may not
15 conclude before the time set for the Further Case Management Conference. Either
16 way, the case may change dramatically between filing of the Joint Case Management
17 Statement and the Conference.
- 18 5. The parties would like to proceed with the mediation process on August 24, 2012,
19 without external time constraints.

20 Therefore the parties stipulate and request that the Court set the Further Case
21 Management Conference on September 28, 2012.

22 IT IS SO STIPULATED.

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DATED: August 9, 2012

LAW OFFICES OF PAUL L. REIN

/s/Celia McGuinness
Celia McGuinness
Attorney for Plaintiff TERRY COCHRELL

DATED: August 13, 2012

GEARINGER LAW GROUP LLP

/s/Brian Gearing
Brian Gearing
Attorney for Plaintiff TERRY COCHRELL

DATED: August 9, 2012

CITY OF BERKELEY ATTORNEY'S OFFICE

/s/Mark Zembsch
Mark Zembsch
Attorneys for Defendant
CITY OF BERKELEY

DATED: August 9, 2012

EDRINGTON, SCHIRMER & MURPHY LLP

/s/James Marzan
James M. Marzan
Attorneys for Defendant
BERKELEY UNIFIED SCHOOL DISTRICT

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ORDER

Pursuant to the stipulation, and for good cause show, IT IS SO ORDERED. The Court hereby grants the parties' request for a continuance of the Further Case Management Conference from August 24, 2012, to September 28, 2012.

DATED: 08/14, 2012

