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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**  
11

12 CARMEN CRUZ et al.,

13 Plaintiffs,

14 v.

15 AT&T MOBILITY SERVICES  
16 LLC, a Delaware Limited Liability  
Company; and DOES 1-100, jointly  
and severally,

17 Defendants.  
18

Case No. CV11-04508-TEH

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO CONTINUE DEADLINE  
TO COMPLETE MEDIATION AND  
TO CONTINUE CASE  
MANAGEMENT CONFERENCE**

Dept.: Courtroom 12  
Judge: Hon. Thelton E. Henderson

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20 Pursuant to the parties' June 22, 2012 stipulation and the Court's June 25,  
21 2012 Order thereon, a mediation deadline was set for September 4, 2012, applicable  
22 to the above referenced case and all related/consolidated cases. The Court also  
23 scheduled a further Case Management Conference for September 17, 2012, at  
24 which the parties would advise the Court of the mediation results. The parties  
25 respectfully request jointly that the Court continue this mediation completion  
26 deadline 60 days, to November 5, 2012, and that the Case Management Conference  
27 be continued to November 16, 2012.  
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1 Good cause exists to continue the mediation deadline in that the parties have  
2 engaged in extensive discovery, but further analysis of the parties' claims and  
3 defenses is necessary to allow for a productive mediation. Plaintiffs have  
4 responded to Defendant's interrogatories, document requests, and requests for  
5 admission. Defendants have objected and responded to Plaintiffs' extensive written  
6 discovery (91 requests for production of documents by each Plaintiff). Defendants  
7 have not yet produced documents responsive to these requests, as they await the  
8 entry of a Protective Order filed by joint stipulation on August 2, 2012. (Additional  
9 language to the Protective Order was requested by the Court, and the revised  
10 Protective Order was submitted on August 29, 2012.) In addition, Defendants have  
11 completed the depositions of eight of the twelve Plaintiffs.

12 In addition to the remaining discovery, which will not be complete before the  
13 September 4, 2012 deadline to complete mediation, the parties need additional time  
14 to analyze the discovery responses and deposition testimony to develop settlement  
15 positions in order for mediation to be successful. The parties have tentatively  
16 reserved October 3, 2012 for a mediation before Susan Haldeman, Esq. in San  
17 Francisco, this date being subject to the parties' obtaining in advance the discovery  
18 necessary to promote a fruitful mediation.

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1 NOW, THEREFORE, subject to the Court's approval, the parties, through  
2 their counsel of record, stipulate and agree that the current September 4, 2012  
3 mediation deadline shall be continued to November 5, 2012, and that the Case  
4 Management Conference currently scheduled for September 17, 2012, shall be  
5 continued to November 16, 2012. The parties intend to appear for this Case  
6 Management Conference telephonically, as previously indicated.

7  
8 Dated: August 30, 2012 CROWELL & MORING LLP

9  
10 By: /s/ S. Shane Sagheb  
11 S. Shane Sagheb  
ssagheb@crowell.com  
Attorney for Defendant

12 Dated: August 30, 2012 GREEN BRYANT & FRENCH, LLP

13  
14 By: /s/ Joel R. Bryant  
15 Joel R. Bryant, Esq.  
16 Jbryant@gbflawyers.com  
Attorney for Plaintiffs

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**ORDER**

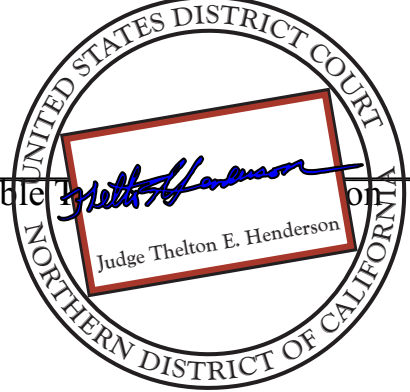
PURSUANT TO STIPULATION, AND GOOD CAUSE APPEARING  
THEREFORE, IT IS ORDERED THAT:

1. The September 4, 2012 mediation completion deadline is continued to  
November 5, 2012; and

2. The September 17, 2012 Case Management Conference is continued to  
November 19, 2012, at 1:30 PM. The parties may appear telephonically.

Dated: 08/30/2012 \_\_\_\_\_

Honorable  on \_\_\_\_\_



Judge Thelton E. Henderson