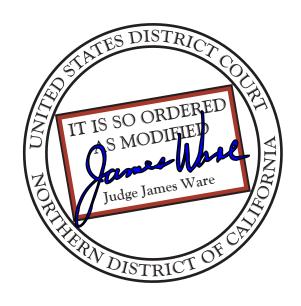
Michael S. Sorgen (SBN 43107) 1 msorgen@sorgen.net Ryan L. Hicks (SBN 260284) 2 rhicks@sorgen.net LAW OFFICES OF MICHAEL S. SORGEN 3 Richard A. Hoyer (SBN 151931) rhoyer@hoyerlaw.com **HOYER & ASSOCIATES** 5 240 Stockton Street, 9th Floor San Francisco, CA 94108 T: (415) 956-1360 6 F: (415) 276-1738 7 Attorneys for Plaintiffs 8 Leila Narvid, Bar No. 229402 9 In@paynefears.com Emily J. Schultz, Bar No. 202815 ejs@paynefears.com PAYNE & FEARS LLP 11 Attorneys at Law One Embarcadero Center, Suite 2300 San Francisco, California 94111 Telephone: (415) 398-7860 13 Facsimile: (415) 398-7863 14 Attorneys for Defendants SERRÁ MEDICAL TRANSPORTATION 15 COMPANY, INC., SERRA YELLOW CAB OF DALY CITY, INC., and TALIB SALAMIN 16 17 18 NAZMI KASTIRO, AHMAD KIWAN and MOHAMED ALGAHIM, on behalf of 20 themselves and all others similarly situated, 21 Plaintiffs, 22 VS. 23 SERRA MEDICAL TRANSPORTATION 24 COMPANY, INC., SERRA YELLOW CAB OF DALY CITY, INC., TALIB SALAMIN 25 and DOES 1-25, Defendants. 26 27



UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SHADI AL LAHHAM, LAITH ABUHEJLEH,

28

Case No. 3:12-cv-00355-JW

## **CLASS ACTION**

STIPULATION REQUESTING EXTENSION OF MEDIATION DEADLINE AND [PROPOSED] ORDER THEREON

[N.D. Cal. ADR Local Rule 6-5]

The Hon. James Ware

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## TO THE CLERK OF COURT AND TO ALL PARTIES AND COUNSEL OF RECORD:

## STIPULATION REQUESTING EXTENSION OF MEDIATION DEADLINE

Pursuant to ADR Local Rule 6-5, all parties hereby stipulate to request extension of the mediation deadline from September 10, 2012 to January 31, 2013.

## **CONSIDERATIONS SUPPORTING THE REQUEST**

The mediation is currently scheduled for September 6, 2011. The parties are currently engaged in formal discovery and also the informal exchange of information for the purposes of mediation. Further information must be exchanged and the parties must be deposed in order for the mediation to be meaningful. Furthermore, as plaintiffs bring putative class claims, Fair Labor Standards Act claims, and collective claims under the California Private Attorneys General Act, plaintiffs must conduct sufficient discovery and investigation such that the Court can approve a settlement in the event that the mediation is successful. As such, the parties hereby request that the mediation deadline be extended until January 31, 2013, so that they may reschedule the mediation without any further continuances. All parties and the mediator concur in the request to extend the deadline.

IT IS SO STIPULATED.

DATED: August 10, 2012

Michael S. Sorgen Rvan L. Hicks

LAW OFFICES OF MICHAEL S. SORGEN

Richard A. Hoyer HOYER & ASSOCIATES

Attorneys for Plaintiffs

| 1  | DATED: Avenuet 40, 2042   |
|----|---|
| 2  | DATED: August 10, 2012  |
| 3  | B <u>y /s/ Leila Narvid</u><br>Leila Narvid                                   |
| 4  | PAYNE & FEARS LLP   |
| 5  | Attorneys for Defendants  |
| 6  |   |
| 7  |   |
|    |   |
| 8  | [PROPOSED] ORDER  |
| 9  | Per the parties' stipulation, and good cause having been shown, the mediation |
| 10 | deadline is hereby extended to January 31, 2011. November 19, 2012.           |
| 11 |   |
| 12 |   |
| 13 | PURSUANT TO STIPULATION, IT IS SO ORDERED.                                    |
| 14 |   |
| 15 | DATED: August <u>16</u> , 2012  |
| 16 |   |
| 17 | By: James Usse  |
| 18 | Upited States District Judge<br>Honorable James Ware                          |
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