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 16 KEYPOINT GOVERNMENT SOLUTIONS, INC.

17 UNITED STATES DISTRICT COURT  
 18 NORTHERN DISTRICT OF CALIFORNIA

19 DONALD LOUNIBOS, individually and  
 20 on behalf of all others similarly situated,

21 Plaintiff,

22 v.

23 KEYPOINT GOVERNMENT  
 SOLUTIONS, INC., a Delaware  
 24 Corporation, and Does 1-10, inclusive,

25 Defendants.  
 26

Case No. 12-CV-0636 (EMC)

**STIPULATION AND [PROPOSED]  
 ORDER CONTINUING ADR DEADLINE  
 AND CONTINUING CASE  
 MANAGEMENT CONFERENCE**

1 The parties hereby stipulate as follows:

2 WHEREAS, the instant matter was referred to panel mediation through the ADR Department  
3 of the Northern District of California. The parties were assigned to mediate this matter with the  
4 Honorable David A. Garcia (Ret.) through JAMS in San Francisco, California. To this end, the  
5 parties' current deadline to complete mediation is September 1, 2012. In light of Judge Garcia's  
6 schedule, however, the first available date the parties could schedule the mediation is September 6,  
7 2012;

8 WHEREAS, a Further Case Management Conference is currently scheduled to take place on  
9 September 14, 2012 at 10:30 a.m. in Courtroom 5, before the Honorable Edward M. Chen; and

10 WHEREAS, the parties respectfully request that the Court grant a 15-day continuance of the  
11 parties' mediation deadline so that the parties can take part in the mediation with Judge Garcia on  
12 September 6, 2012;

13 IT IS THEREFORE STIPULATED AND AGREED that the parties shall complete  
14 mediation on or before September 15, 2012. The parties further stipulate to continue the Further Case  
15 Management Conference until October 12, 2012 at 10:30 a.m. in Courtroom 5, if that is convenient to  
16 the Court. The parties shall file a Joint Case Management Statement at least one week prior to the Case  
17 Management Conference.

18 **IT IS SO STIPULATED.**

19 DATED: July 18, 2012

NORTH BAY LAW GROUP

21 \_\_\_\_\_  
22 /s/  
23 David S. Harris  
24 Attorney For Plaintiff  
25 DONALD LOUNIBOS

26 DATED: July 18, 2012

LITTLER MENDELSON

27 \_\_\_\_\_  
28 /s/  
Michelle Heverly  
Attorneys for Defendant  
KEYPOINT GOVERNMENT SOLUTIONS

1 **IT IS HEREBY ORDERED AS FOLLOWS:**

2 The parties shall complete mediation on or before September 15, 2012. The Further Case  
3 Management Conference is continued to October ~~12~~<sup>26</sup>, 2012 at 10:30 a.m. in Courtroom 5. The  
4 parties shall file a Joint Case Management Statement at least one week prior to the Conference.

5 DATED: July 24, 2012

6  
7  
8 Firmwide: 113238284.1 063273.1017

