

1 STEVEN L. HAMMOND (SBN 220521)
 ANDREW M. KLIMENKO (SBN 124612)
 2 Hammond Law Group, P.C.
 One Embarcadero Center, Suite 2360
 3 San Francisco, California 94111
 Telephone: (415) 955-1915

4 DAVID HARRIS (SBN 215224)
 North Bay Law Group
 5 116 E Blithedale Avenue, Suite 2
 Mill Valley, CA 94941
 6 Telephone: (415) 388-8788

7 FRANCIS SHEHADEH (SBN 251130)
 Law Office of Francis J. Shehadeh
 8 819 Eddy Street
 San Francisco, CA 94109
 9 Telephone: (415) 771-6174

10 Attorneys for Plaintiff
 11 DONALD LOUNIBOS

12 MICHELLE B. HEVERLY (SBN 178660)
 KARIN M. COGBILL (SBN 244606)
 13 LITTLER MENDELSON, P.C.
 50 W. San Fernando, 15th Floor
 14 San Jose, CA 95113.2303
 Telephone: (408) 998.4150

15 Attorneys for Defendant
 16 KEYPOINT GOVERNMENT SOLUTIONS, INC.

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA

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

20 Plaintiff,

21 v.

22 KEYPOINT GOVERNMENT
 23 SOLUTIONS, INC., a Delaware
 Corporation and DOES 1-10, inclusive,

24 Defendants.
 25

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 October 15, 2012. A Further Case Management
6 Conference is currently scheduled to take place on October 26, 2012 at 10:30 a.m. in Courtroom 5,
7 before the Honorable Edward M. Chen;

8 WHEREAS, the parties have exchanged documentation and taken the deposition of the
9 Plaintiff Donald Lounibos, as well as taken the depositions of two employees at Defendant KeyPoint
10 Government Solutions, Inc. During the depositions, the parties acknowledged the need for an
11 additional exchange of documentation in order to ensure a productive mediation. As a result, the
12 mediation with Judge David A. Garcia (Ret.) was rescheduled to take place at JAMS in
13 San Francisco on November 2, 2012, the first mutually-agreeable date for all parties;

14 WHEREAS, the parties respectfully request that the Court grant a 30-day continuance of the
15 parties' mediation deadline so that the parties can take part in mediation with Judge Garcia on
16 November 2, 2012;

17 IT IS THEREFORE STIPULATED AND AGREED that the parties shall complete all
18 mediation efforts on or before November 15, 2012. The parties further stipulate to continue the Case
19 Management Conference until November 30, 2012, at 10:30 a.m. in Courtroom 5, if that date is
20 convenient to the Court. The parties shall file a Joint Case Management Statement at least one week
21 prior to the Case Management Conference.

22 **IT IS SO STIPULATED.**

23 DATED: October 10, 2012

24 NORTH BAY LAW GROUP

25
26 _____/s/
27 David S. Harris
28 Attorney For Plaintiff
DONALD LOUNIBOS

1 DATED: October 10, 2012

LITTLER MENDELSON

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

/s/

Michelle Heverly
Attorneys for Defendant
KEYPOINT GOVERNMENT SOLUTIONS

IT IS HEREBY ORDERED AS FOLLOWS:

The parties shall engage in mediation with Hon. David A. Garcia at JAMS in San Francisco on November 2, 2012, and all mediation efforts shall be completed on or before November 15, 2012. The Case Management Conference is continued to November 30, 2012, at 10:30 a.m. in Courtroom 5. The parties shall file a Joint Case Management Statement at least one week prior to the Conference.

DATED: October 15, 2012

Honorable Edward M. Chen
United States District Court Judge

Firmwide:115081196.1 063273.1017