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27 Attorneys for Defendants

28 **UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

29 MOHAMMMAD SALIMI; AUGUST )  
 30 GALARGA )  
 31 )  
 32 Plaintiff, )  
 33 vs. )  
 34 BMW FINANCIAL SERVICES NA, LLC; )  
 35 ASSET ACQUISITION GROUP, LLC; and )  
 36 DOES 1-50, inclusive, )  
 37 )  
 38 Defendants. )

Case No. 3:12-cv-1754 JSW  
**STIPULATION AND [PROPOSED]  
 ORDER TO VACATE COURT-  
 ASSIGNED MEDIATOR AND PROCEED  
 WITH SCHEDULED JAMS MEDIATION**

1 WHEREAS on November 6, 2012, the Court assigned this matter to the Court's ADR  
2 mediation program;

3 WHEREAS the parties had previously agreed to pursue private mediation with JAMS;

4 WHEREAS the parties had scheduled a mediation with the Honorable Ronald Sabraw  
5 (Ret.) on January 15, 2013;

6 WHEREAS the parties have discussed this issue with Sharon O'Grady, the mediator  
7 appointed pursuant to the Court's ADR mediation program;

8 WHEREAS the parties believe that Judge Sabraw's prior experience mediating similar  
9 cases will be very helpful in this matter;

10 WHEREAS the parties desire to proceed with the mediation with Judge Sabraw on  
11 January 15, 2013;

12 WHEREAS Ms. O'Grady has no objection to the parties' utilizing Judge Sabraw for  
13 the mediation;

14 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY AND  
15 AMONG THE PARTIES, THROUGH THEIR RESPECTIVE COUNSEL, AS FOLLOWS:

16 1. The Court's Order of November 6, 2012 assigning this matter to the Court's  
17 ADR mediation program shall be vacated; and

18 2. The parties shall proceed with their scheduled mediation with Judge Sabraw  
19 (Ret.) on January 15, 2013.

20 Dated: December 13, 2012

CHAVEZ & GERTLER LLP

KEMNITZER, BARRON & KRIEG LLP

*/s/ Mark A. Chavez*

23 By: \_\_\_\_\_  
Mark A. Chavez  
Counsel for Plaintiffs

25 JEFFER MANGELS BUTLER & MITCHELL  
LLP

26 Dated: December 13, 2012

*/s/ Michael J. Hassen*

27 By: \_\_\_\_\_  
Michael J. Hassen  
Counsel for Defendants

**IT IS SO ORDERED**

Dated: December 14, 2012

  
HON. JEFFREY S. WHITE  
United States District Court

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