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BEST BUY STORES, L.P.
(erroneously sued as "BEST BUY CO., INC.")

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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SHAUN CHARLES,

Plaintiff,

v.

BEST BUY CO., INC., and DOES 1 to 50,
inclusive,

Defendants.

Case No. C 12-02934 MMC

**STIPULATION TO CONTINUE
MEDIATION DEADLINE BY 30 DAYS
AND DISCOVERY CUTOFF
DEADLINE BY 60 DAYS;
~~[PROPOSED]~~ ORDER THEREON**

Plaintiff Shaun Charles and Defendant Best Buy Stores, L.P., collectively "the Parties", by and through their counsel, stipulate and agree as follows:

1. WHEREAS, this action was filed with the Alameda County Superior Court on April 27, 2012 and removed to the United States District Court for the Northern District of California on June 6, 2012.

STIPULATION TO CONTINUE MEDIATION DEADLINE BY 30 DAYS AND DISCOVERY CUTOFF
DEADLINE BY 60 DAYS; [PROPOSED] ORDER THEREON
CASE NO. C 12-02934 MMC

2. WHEREAS, on September 12, 2012, the Court issued an Order Selecting ADR Process, setting March 29, 2013 as the deadline for the Parties to complete private mediation.

3. WHEREAS, an initial Case Management Conference was held on September 21, 2012. The Court set May 24, 2013 as the discovery cutoff, August 2, 2013 as the deadline for filing dispositive motions, and November 4, 2013 as the trial date.

4. WHEREAS, Defendant served written discovery in October 2012 and received, after granting an extension of time to respond, responses thereto in December 2012.

5. WHEREAS, after a period of illness, Plaintiff's counsel's mother passed away in January 2013, leading to some delay in discovery. While Plaintiff has served Requests for Production of Documents and received responses thereto, Plaintiff served Special Interrogatories on February 5, 2013.

6. WHEREAS, written discovery and some depositions are needed to help facilitate mediation.

7. WHEREAS, the Parties have selected Dan Quinn Esq. to serve as mediator and have reserved April 26, 2013 for a full day of mediation with Mr. Quinn.

8. WHEREAS, an April 26, 2013 mediation date leaves less than a month before the May 24, 2013 discovery cutoff, and the Parties would prefer to conserve resources and not engage in all necessary discovery prior to mediation.

NOW THEREFORE, all Parties hereto stipulate and agree, and request, that the Court enter an Order continuing the mediation deadline by 30 days and the discovery cutoff deadline by 60 days. The mediation deadline shall be _____. The discovery cutoff shall be _____.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

1 DATED: February 21, 2013

Respectfully submitted,

2 SEYFARTH SHAW LLP

3
4 By: /s/ Eden Anderson

5 Michael J. Burns

Eden Anderson

Attorneys for Defendant

6 BEST BUY STORES, L.P.

7 (erroneously sued as "BEST BUY CO., INC.")

8 LAW OFFICES OF SHARON COHEN

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11 Attorney for Plaintiff

12 DATED: February 21, 2013

LAW OFFICES OF SHARON COHEN

13
14 By: /s/ Sharon Cohen

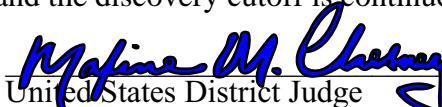
Sharon Cohen

15 Attorney for Plaintiff

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17 PURSUANT TO STIPULATION, IT IS SO ORDERED. Specifically, the deadline to
complete mediation is continued to April 30, 2013, and the discovery cutoff is continued to
18 July 19, 2013.

~~DATED:~~

19 Dated: February 25, 2013


United States District Judge

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