

1 Thomas F. Bertrand, State Bar No. 056560
 2 Richard W. Osman, State Bar No. 167993
 3 BERTRAND, FOX & ELLIOT
 4 The Waterfront Building
 5 2749 Hyde Street
 6 San Francisco, California 94109
 7 Telephone: (415) 353-0999
 8 Facsimile: (415) 353-0990

9 Attorneys for Defendants
 10 CITY OF NOVATO, CHIEF JOSEPH KREINS,
 11 OFFICER THOMAS MACKENZIE, OFFICER
 12 MICHAEL DUNN and OFFICER STEPHANIE
 13 COMMISTO

14 David L. Fiol, State Bar No. 203546
 15 BRENT, FIOL & NOLAN LLP
 16 Two Embarcadero Center, 18th Floor
 17 San Francisco, California 94111
 18 Telephone: (415) 259-4420
 19 Facsimile: (415) 373-4420

20 Attorneys for Plaintiffs
 21 LYNNETTE FRARY AND JAMIE BALL

22 Steven M. Perl, State Bar No. 100074
 23 Renee Giacomini Brewer, State Bar No. 173012
 24 OFFICE OF THE COUNTY COUNSEL
 25 3501 Civic Center Drive, Room 275
 26 San Rafael, CA 94903
 27 Telephone.: (415) 473-6117
 28 Facsimile: (415) 473-3796

Attorneys for Defendants
 COUNTY OF MARIN,
 SHERIFF ROBERT T. DOYLE,
 and DEPUTY RACHEL HAMMER

Charles A. Bonner, State Bar No. 85413
 A. Cabral Bonner, State Bar No. 247528
 BONNER & BONNER
 475 Gate Five Road, Suite 212
 Sausalito, CA 94965
 Telephone: 415-331-3070
 Facsimile: 415-331-2738

Attorneys for Plaintiff
 HEATHER HOWARD

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

LYNNETTE FRARY, Individually and as
 Administrator of the Estate of Anthony
 Brandon Carmignani, Deceased, JAMIE BALL,
 as Natural Guardian of Amaya Carmignani, a
 minor, and HEATHER HOWARD,

Plaintiffs,

v.

COUNTY OF MARIN, et al.,

Defendants.

Case No. 3:12-cv-03928-MEJ

**STIPULATION TO CONTINUE MEDIATION
 DEADLINE**

Trial Date: April 14, 2014

1 Pursuant to Northern District ADR Local Rule 6-5, the parties, by and through their respective
2 counsel, hereby stipulate and request that the deadline to complete mediation in this matter be extended
3 from June 10, 2013 to September 30, 2013.

4 On March 7, 2013, the Court issued its case management order, scheduling trial for April 14,
5 2014 and referring this matter to mediation. Pursuant to Northern District ADR Local Rule 6-4(b),
6 mediation is to be completed by June 10, 2013.

7 On April 8, 2013, all parties except HEATHER HOWARD, exchanged initial disclosures.
8 HEATHER HOWARD served her initial disclosures on April 16, 2013.

9 On April 18, 2013, the Court issued its order appointing mediator Noah G. Blechman.

10 The parties recently commenced discovery and believe it is important and necessary to complete
11 multiple depositions, including the depositions of plaintiffs, police personnel, jail personnel and medical
12 staff prior to submitting the matter to mediation.

13 All counsel discussed the mediation deadline and agreed to request a continuance of the June 10,
14 2013 deadline to September 30, 2013 to accommodate the need to undertake significant discovery to
15 make the mediation session productive. The parties also notified Mr. Blechman of their intent to seek a
16 continuance of the mediation deadline.

17 **IT IS SO STIPULATED.**

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Dated: April 26, 2013

BERTRAND, FOX & ELLIOT

By: /s/ Richard W. Osman

Thomas F. Bertrand
Richard W. Osman
Attorneys for Defendants
CITY OF NOVATO, CHIEF JOSEPH KREINS,
OFFICER THOMAS MACKENZIE, OFFICER
MICHAEL DUNN and OFFICER STEPHANIE
COMMISTO

Dated: April 26, 2013

BRENT, FIOLE & NOLAN LLP

By: /s/ David L. Fiol

David L. Fiol
Attorneys for Plaintiffs
LYNNETTE FRARY AND JAMIE BALL

Dated: April 26, 2013

BONNER & BONNER

By: /s/ Charles A. Bonner

Charles A. Bonner
Attorneys for Plaintiff
HEATHER HOWARD

Dated: April 26, 2013

OFFICE OF THE COUNTY COUNSEL

By: /s/ Steven M. Perl

Steven M. Perl
Attorneys for Defendants
COUNTY OF MARIN,
SHERIFF ROBERT T. DOYLE,
and DEPUTY RACHEL HAMMER

~~PROPOSED ORDER~~

Upon the foregoing Stipulation, and for good cause shown, IT IS ORDERED that the deadline to complete mediation in the present matter is continued from June 10, 2013 to September 30, 2013

DATED: April 30, 2013



HONORABLE MARIA-ELENA JAMES