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 12 COUNTY OF SONOMA, JULIE S. PAIK,  
 13 S. SULLIVAN, LAURIE LAPIDUS and ANNA NEW

14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA

16 JAVIER AGUSTO ALVAREZ,

17 Plaintiff,

18 v.

19 SONOMA COUNTY, JULIE S. PAIK, LISA  
 20 M. CERVANTES, ANNA NEW, JAN C.  
 21 STURLA, MEGAN F. ALVAREZ,  
 22 EXCHANGE BANK and DOES 1 through 50,  
 23 INCLUSIVE,

24 Defendants.

Case No. C 12-5606 (EMC)

**STIPULATED REQUEST TO CONTINUE  
 EARLY NEUTRAL EVALUATION AND  
 [PROPOSED] ORDER**

**Hon. Edward M. Chen**

**STIPULATION**

25 The parties, Plaintiff JAVIER ALVAREZ and Defendants COUNTY OF SONOMA, JULIE S.  
 26 PAIK, S. SULLIVAN, LAURIE LAPIDUS and ANNA NEW (hereinafter "Sonoma Defendants"), by  
 27 and through their attorney of record, hereby stipulate as follows:

28 1. On May 16, 2013, the Court referred this matter to Early Neutral Evaluation (ENE) within  
 90 days. (Docket No. 35.)

1           2.       On June 4, 2013, the Court assigned Marjorie Gelb as the Evaluator for this case. (Docket  
2 No. 40.) The ENE was scheduled for August 1, 2013.

3           3.       On June 28, 2013, Plaintiff ALVAREZ filed a second amended complaint containing new  
4 allegations and naming additional defendants. (Docket No. 41.)

5           4.       On July 12, 2013, Sonoma Defendants filed a motion to dismiss Plaintiff's second  
6 amended complaint. (Docket No. 45.)

7           5.       On July 17, 2013, Richard Osman, counsel for Sonoma Defendants, contacted Plaintiff  
8 ALVAREZ to meet and confer regarding continuing the ENE for 60 days in order to accommodate the  
9 pending motion to dismiss. Plaintiff ALVAREZ agreed to extend the ENE for 60 days.

10          6.       On July 18, 2013, Sheila Crawford, counsel for Sonoma Defendants, contacted the  
11 Evaluator, Marjorie Gelb, to discuss continuing the ENE. Given the current status of this matter, Ms.  
12 Gelb agreed continuing the ENE for 60 days was reasonable.

13          7.       The Parties respectfully request that the Court approve this stipulation and continue the  
14 ENE for 60 days from August 14, 2013.

15               **IT IS SO STIPULATED.**

16 Dated: July 22, 2013

BERTRAND, FOX & ELLIOT

17 By:           /s/ Sheila D. Crawford            
18 Sheila D. Crawford  
19 Richard W. Osman  
20 Attorneys for Defendants  
21 COUNTY OF SONOMA, JULIE S. PAIK,  
22 S. SULLIVAN, LAURIE LAPIDUS and ANNA  
23 NEW

24 Dated: July 22, 2013

Plaintiff, *In Pro Per*

25 By:           /s/ Javier Alvarez            
26 Javier Alvarez  
27 Plaintiff

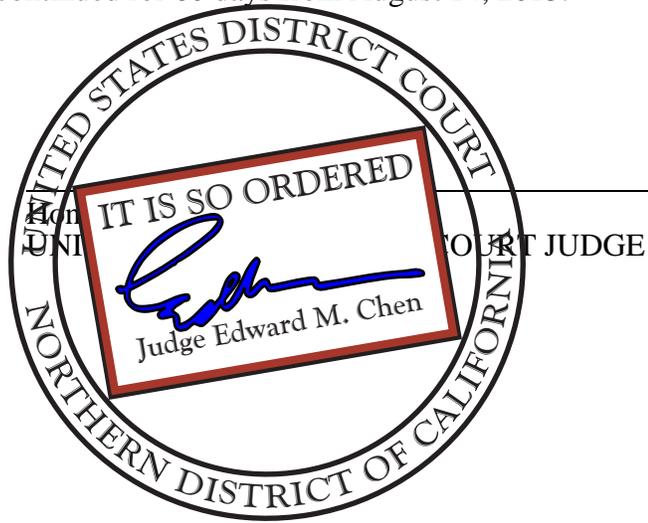
~~PROPOSED~~ ORDER

Having reviewed the stipulation between the parties herein, IT IS HEREBY ORDERED that the Early Neutral Evaluation of this matter be continued for 60 days from August 14, 2013.

IT IS SO ORDERED.

7/23

DATED: \_\_\_\_\_, 2013



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