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21 UNITED STATES DISTRICT COURT  
 22 NORTHERN DISTRICT OF CALIFORNIA

23 RICHARD VELOZ, 24 Plaintiff, 25 v. 26 PACIFIC GAS & ELECTRIC COMPANY, 27 IBEW LOCAL 1245, and DOES 1 through 10, 28 Defendants.	) CASE NO. 3:12-cv-06309-WHA ) <b>STIPULATED REQUEST TO EXTEND</b> ) <b>DEADLINE TO COMPLETE MEDIATION</b> ) <b>AND [<del>PROPOSED</del>] ORDER</b> ) <b>[Pursuant to ADR Local Rule 6-5, Civil Local</b> ) <b>Rules 6-2, 7-1, and 7-12]</b> ) Deadline for Mediation: June 5, 2013 ) Proposed Deadline: June 14, 2013
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STIPULATED REQUEST FOR ORDER TO EXTEND MEDIATION DEADLINE - Case No. 3:12-cv-06309-WHA



1 COMES NOW the parties, represented by their counsel, and request the Court for an order  
2 extending the time to conduct and complete the mediation. The above-entitled action was referred to  
3 mediation on March 7, 2013 (Case Management Order, #18); hence, the current deadline for  
4 mediation is June 5, 2013. All parties support this request to extend the mediation deadline by nine  
5 days. The following considerations support this request:  
6

- 7 1. *Unavailability of Mediator and Counsel for Defendant IBEW Local 1245 between May*  
8 *18-June 9.* Mediator Mary Shea has informed the parties that she will be out of the  
9 country from May 18-26, 2013. Additionally, Jenny Marston, counsel for Defendant  
10 IBEW Local 1245, purchased plane tickets in February for a family vacation scheduled  
11 for May 31-June 9, 2013.  
12
- 13 2. *Necessity of Additional Discovery.* Discovery is proceeding, however, more is necessary  
14 in order to complete the mediation. To this end, all sides have exchanged written  
15 discovery and the Plaintiff as well as a witnesses for Defendants have been deposed. In  
16 addition, the parties have scheduled two additional depositions of PG&E's witnesses,  
17 which Plaintiff wishes to occur prior to the mediation. Those depositions have been  
18 scheduled for May 30 and June 13, 2013.  
19
- 20 3. *Should the Court grant this request, the parties have already set aside June 14, 2013, to*  
21 *hold and complete the mediation.* So as to not unnecessarily delay in scheduling the  
22 mediation, the parties have agreed to hold mediation on June 14, 2013. Additionally, the  
23 parties agree that June 14, 2013, shall be the new deadline for completion of mediation  
24 should the Court grant this stipulated request.  
25

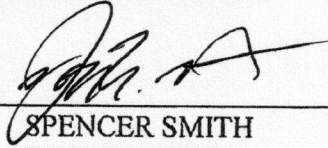
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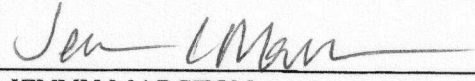


1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.


2 DATED: May 21, 2013

3 By:   
4 SPENCER SMITH  
5 DOW PATTEN  
6 SMITH PATTEN  
7 Attorneys for Plaintiff RICHARD VELOZ

8 DATED: May 22, 2013

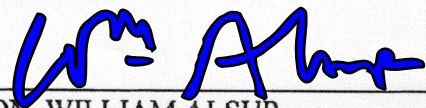
9 By:   
10 JENNY MARSTON  
11 IBEW LOCAL UNION 1245  
12 Attorney for Defendant  
13 IBEW LOCAL UNION 1245

14 DATED: May 21, 2013

15 By:   
16 GARY LAFAYETTE  
17 LAFAYETTE & KUMAGAI LLP  
18 Attorneys for Defendant  
19 PACIFIC GAS & ELECTRIC CO.

20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21 DATED: May 23, 2013.

22 By:   
23 HON. WILLIAM ALSUP  
24 UNITED STATES DISTRICT JUDGE