

MICHAEL J. REED (SBN 122324)  
[mreed10202@aol.com](mailto:mreed10202@aol.com)  
 ATTORNEY AT LAW  
 60 Creek Tree Lane  
 Alamo, CA 94507  
 Telephone: (925) 743-8353  
 Facsimile: (734) 468-6168

Attorney for Plaintiff  
 SONYA ALFORD

KRISTIN L. OLIVEIRA (SBN 204384)  
[koliveira@hkemploymentlaw.com](mailto:koliveira@hkemploymentlaw.com)  
 HIRSCHFELD KRAEMER LLP  
 505 Montgomery Street 13th Floor  
 San Francisco, CA 94111  
 Telephone: (415) 835-9000  
 Facsimile: (415) 834-0443

Attorneys for Defendant  
 AMERICAN RED CROSS NORTHERN  
 CALIFORNIA BLOOD SERVICES REGION  
 (erroneously sued as AMERICAN RED CROSS  
 BLOOD SERVICES)

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

SONYA ALFORD,

Plaintiff,

vs.

AMERICAN RED CROSS BLOOD  
 SERVICES, a business entity form  
 unknown and DOES 1-50,

Defendant.

Case No. C 13-01499 WHA

**JOINT STIPULATION TO CONTINUE  
 DEADLINE TO COMPLETE ADR;  
~~[PROPOSED]~~ ORDER**

**Complaint Filed:** March 4, 2013

TO THE COURT:

Plaintiff SONYA ALFORD (“Plaintiff”) and Defendant AMERICAN RED CROSS  
 NORTHERN CALIFORNIA BLOOD SERVICES REGION (erroneously sued as AMERICAN  
 RED CROSS BLOOD SERVICES) (“Defendant”), by and through their respective counsel of

record, herein agree and stipulate as follows:

**RECITALS**

1. On May 28, 2013, the parties agreed to participate in court-sponsored Alternative Dispute Resolution (ADR), specifically mediation. (ECF Document 12)

2. In an Order dated June 21, 2013, the Court referred the parties to ADR. (ECF Document 15) The parties requested a continuance of the ADR deadline to October 15, 2013 in their Stipulation (ECF Document 12), but the Court did not issue an Order with respect to this request.

3. According to ADR Local Rule 3-6, the parties must complete ADR by September 19, 2013. ADR statements are due 10 days before an ADR session. Assuming the mediation was scheduled for the current deadline of September 19, 2013, the latest an ADR statement would be due is September 9, 2013.

4. Defendant will take Plaintiff's deposition on September 12, 2013, which was the first available date for the parties and counsel following the exchange of written discovery. Defendant anticipates that Plaintiff's testimony will impact Defendant's ADR statement and its position at the mediation.

5. Accordingly, the parties respectfully request a continuance of the ADR deadline to October 15, 2013 to give Defendant sufficient time to take essential discovery before participating in mediation.

**STIPULATION**

NOW, THEREFORE, Plaintiff and Defendant hereby agrees and stipulates as follows, subject to Court approval, that the deadline for the parties to complete ADR set for September 19, 2013 be continued to **October 15, 2013**.

IT IS SO STIPULATED:

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: August 20, 2013

MICHAEL J. REED

By: /s/ Michael J. Reed

Michael J. Reed

Attorney for Plaintiff

SONYA ALFORD

Dated: August 20, 2013

HIRSCHFELD KRAEMER LLP

By: /s/ Kristin L. Oliveira

Kristin L. Oliveira

Attorneys for Defendant


AMERICAN RED CROSS NORTHERN

CALIFORNIA BLOOD SERVICES REGION

~~PROPOSED~~ ORDER

Pursuant to the parties' Joint Stipulation, it is so ordered that the deadline to complete Alternative Dispute Resolution is continued from September 19, 2013 to **October 15, 2013**.

Dated: September 3, 2013.

By:   
William Alsup  
Judge of the United States District Court