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6	UNITED STATES DISTRICT COURT	
7	NORTHERN DISTRICT OF CALIFORNIA	
8	RICHARD SKAFF	CASE NO. C 13-01926 NC
9	Plaintiff,	Civil Rights
10	V.	ADMINISTRATIVE MOTION.
11	CITY OF SAUSALITO and DOES 1	ADMINISTRATIVE MOTION, DECLARATION, AND [PROPOSED] ORDER FOR RELIEF FOR CASE
12	through 20, Inclusive,	MANAGEMENT CONFERENCE
13	Defendants.	Pursuant to General Order 56, paragraph 8 And Local Civil Rule 7-11
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15	ADMINISTRATIVE MOTION	
16	Plaintiff brought this action against defendant City of Sausalito	
17	alleging violations of Title II of the Americans With Disabilities Act and related	
18	statutes and regulations. Accordingly, this case is governed by the procedures of	
19	General Order 56.	
20	The parties have complied with the requirements of paragraphs 1	
21	through 7 of General Order 56.	
22	The parties have held two mediations and had scheduled a further	
23	mediation for April 30 and May 1, 2014.	
24	By e mail dated April 17, 2014 to mediator Daniel Bowling and the	
25	undersigned, defendant's City of Sausalito's counsel stated "that from the	
26	City's standpoint, the mediation process went forward in good faith (two	
27	sessions) and is now completed, albeit without resolution." Defendant's counsel	

then requested "... that the mediation be certified as completed per GO 56."

On April 24, 2014 the mediator certified that the case did not settle, that further facilitated discussions are not expected, and that the ADR process is complete (See DKT # 13).

Because the case has not settled at mediation, Plaintiff files this Motion For Administrative Relief requesting a Case Management Conference pursuant to the requirements of paragraph 8 of General Order 56 and Local Civil Rule 7-11.

In scheduling a Case Management Conference, please take note of the fact that Mr. Cohen, a solo practitioner and counsel for plaintiff, will be out of the country and otherwise unavailable for any purpose during the period May 12, 2014 through June 1, 2014. (See DKT # 14.) In this regard, Plaintiff requests that the Case Management Conference be set for Wednesday, June 11, 2014.

Date: May 1, 2014

SIDNEY J. COHEN PROFESSIONAL CORPORATION

/s/ Sidney J. Cohen

Sidney J. Cohen Attorney for Plaintiff Richard Skaff

DECLARATION OF SIDNEY J. COHEN

I, Sidney J. Cohen, declare:

1. I am counsel for Plaintiff in this action. I am an attorney in good standing and licensed to practice in the courts of California, in the United States District Courts for the Northern, Eastern, and Central Districts, in the United States Court of Appeals for the Ninth Circuit, and in the United States Supreme Court. If called upon to testify, I would testify as follows regarding the reasons I was not able to obtain a Stipulation from defendant City of Sausalito's counsel, Adam Abel, agreeing to a Case Management Conference.

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- 2. By e mail to Mr. Abel dated April 24, 2014, a true and correct copy of which is enclosed as Exhibit 1, I, among other things, advised that pursuant to paragraph 8 of General Order 56 and Local Civil Rule 7-11 Plaintiff was obligated to file with the Court a Motion For Administrative Relief for a Case Management Conference by no later than May 1,2014 and that the Motion had to be accompanied by a Stipulation under Local Civil Rule 7-12 or by a declaration stating why a stipulation could not be obtained. In this regard, attached to the April 24 e mail for Mr. Abel's review was Plaintiff's proposed "MOTION, STIPULATION, AND [PROPOSED] ORDER FOR ADMINISTRATIVE RELIEF FOR CASE MANAGEMENT CONFERENCE," a true and correct copy of which is enclosed as Exhibit 2.
- 3. My April 24, 2014 e mail further requested that following his review Mr. Abel date, sign, and provide me the dated and signed Stipulation if it was acceptable to him, to e mail or call me if he had questions or concerns, or to otherwise let me know if the Defendant City of Sausalito was not willing to stipulate.
- 4. Finally, my April 24, 2014 e mail advised that if I did not have an agreed upon, dated, and signed Stipulation by April 29, 2014 that I would prepare the Motion with a declation that I could not obtain a Stipulation.
- 5. I have not received any communications whatsoever from Mr. Abel, or anyone else, in response to or in connection with this matter.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of May, 2014 at Oakland, California.

/s/ Sidney J. Cohen

Sidney J. Cohen

ORDER

Pursuant to paragraph 8 of General Order 56 and Local Civil Rule

IT IS SO ORDERED.

Date: May 1, 2014

