

1 MELINDA HAAG (CABN 132612)
 United States Attorney
 2 ALEX G. TSE (CABN 152348)
 Chief, Civil Division
 3 MICHELLE LO (NY Bar No. 4325163)
 Assistant United States Attorney
 4
 450 Golden Gate Avenue, Box 36055
 5 San Francisco, California 94102
 Telephone: (415) 436-7200
 6 Facsimile: (415) 436-6748
 Email: Michelle.Lo@usdoj.gov

7 Attorneys for the United States of America

8 W. Christian Krankemann (CABN 220438)
 9 Jon A.C. Vonder Haar (CABN 192665)
 Krankemann Law Offices

10 375 E Street, Suite 120
 11 Santa Rosa, California 95404
 Telephone: (707) 524-2200
 12 Facsimile: (866) 858-0100
 Email: jvh@krankemann.com
 13 wck@krankemann.com

14 Attorneys for Plaintiff

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA
 17 SAN FRANCISCO DIVISION

18 CATHERINE VIVERS,
 19 Plaintiff,

20 v.

21 UNITED STATES OF AMERICA,
 22 Defendant.
 23

Case No. 13-03444 SC
 Related Case No. 13-03148 SC

**STIPULATION AND ~~PROPOSED~~
 ORDER TO CONTINUE STATUS
 CONFERENCE AND JOINT STATUS
 REPORT DEADLINE**

IT IS SO ORDERED AS MODIFIED

1 Plaintiff, Catherine Vivers, and Defendant, the United States of America, by and through their
2 undersigned attorneys, hereby stipulate as follows:

3 1. At the initial case management conference held on March 7, 2014, the Court directed the
4 parties to file a stipulation and proposed order for mediation once they agreed on a potential mediator.
5 The parties held phone conferences with the ADR Program Legal Staff on April 7, 2014, and June 10,
6 2014. Due to a procedural misunderstanding, however, the parties did not file their stipulation and
7 proposed order for mediation until today, June 10, 2014. *See* ECF No. 35.

8 2. At the March 7, 2014, initial case management conference, the Court also set a further
9 status conference for Friday, June 20, 2014, at 10 a.m., and ordered the parties to file an updated status
10 report by June 13, 2014. ECF No. 31.

11 3. Because the parties have not had an opportunity to engage in the ADR process to date,
12 they have requested a period of 90 days in which to schedule mediation and conduct limited discovery to
13 facilitate meaningful discussions. In light of these circumstances, the parties respectfully request that
14 the Court continue the status conference scheduled for June 20, 2014, to September 26, 2014, or such
15 later date as the Court's calendar permits.

16 4. The parties will work in good faith to mediate the case prior to a further status conference
17 on September 26, 2014, or such later date as the Court may set.

18 5. Accordingly, the parties hereby agree and stipulate to a continuance of the status
19 conference scheduled to September 26, 2014, and the related joint status report deadline to September
20 19, 2014, or such later date as the Court may set, and request that the Court order the same.

21 **SO STIPULATED.**

22 DATED: June 10, 2014

Respectfully submitted,

23 MELINDA HAAG
24 United States Attorney

25 /s/ Michelle Lo
26 MICHELLE LO
27 Assistant United States Attorney
28 Attorneys for the United States of
America

1 DATED: June 10, 2014

KRANKEMANN LAW OFFICES

2 /s/ Jon A.C. Vonder Haar
3 JON A.C. VONDER HAAR
4 Attorneys for Plaintiff

5 *I, Michelle Lo, attest that I have obtained concurrence in the filing of this document from Plaintiff's
6 counsel, Jon Vonder Haar.

7 /s/ Michelle Lo
8 Michelle Lo

9 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

10 The further status conference scheduled for June 20, 2014, at 10 a.m. is continued to ~~September 26,~~ November 14,
11 2014, at 10 a.m. The parties shall file a joint status report at least seven days prior to the conference.

12
13 DATED: 06/12/2014

