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 EMERITUS CORPORATION
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19 UNITED STATES DISTRICT COURT
 20 NORTHERN DISTRICT OF CALIFORNIA
 21 SAN FRANCISCO DIVISION

22		
23	ARVILLE WINANS, by and through his) CASE NO.: 3:13-cv-03962- SC
	guardian ad litem, RENEE MOULTON, on his)
	own behalf and on behalf of others similarly)
24	situated,) STIPULATION REGARDING
) SCHEDULE ON CASE MANAGEMENT
	Plaintiff,) CONFERENCE AND MEDIATION;
25)
	v.)
26) DECLARATION OF GUY B. WALLACE
	EMERITUS CORPORATION and DOES 1) PURSUANT TO L.R. 6-2 (a)
27	through 100,)
)
28	Defendants.)

1 *Additional Counsel For Plaintiff:*

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1 **WHEREAS**, there is a Case Management Conference presently set for February 20, 2015;

2 **WHEREAS**, the parties have agreed to attend mediation of the above-captioned matter at
3 JAMS with the Honorable William Cahill (Ret.) on March 5, 2015;

4 **WHEREAS**, the parties desire to focus their efforts at this juncture on preparation for the
5 upcoming mediation rather than on issues pertaining to case management herein;

6 **WHEREAS**, Plaintiff has served written discovery, and the parties have agreed that
7 Defendant may, subject to its objections, make further responsive productions regarding same on a
8 rolling basis commencing on March 26, 2015 with respect to non-privileged documents responsive
9 to Plaintiff's notices of depositions and the requests for production of documents served therewith;

10 **WHEREAS**, the parties have agreed that Defendant may, subject to its objections,
11 complete its production of responsive, non-privileged documents with respect to Plaintiff's First
12 Set of Requests for Production of Documents and Plaintiff's Second Set of Requests for Production
13 of Documents by no later than May 8, 2015;

14 **WHEREAS**, the parties agree that the Case Management Conference presently set for
15 February 20, 2015 should be continued to April 17, 2015, or to a similar date convenient to the
16 Court's schedule;

17 **NOW, THEREFORE**, Plaintiff and Defendant, by and through their counsel of record and
18 subject to Court approval, hereby stipulate that:

19 1. The parties shall attend mediation with the Hon. William Cahill (Ret.) at JAMS on
20 March 5, 2015;

21 2. The Case Management Conference set for February 20, 2015 be rescheduled for
22 April 17, 2015 or a date shortly thereafter convenient to the Court's schedule;

23 3. Unless otherwise agreed by the parties in connection with the upcoming mediation,
24 Defendant shall resume a rolling production of non-privileged documents, subject to its objections,
25 in response to Plaintiff's Notices of Deposition and the accompanying Requests for Production of
26 Documents by no later than
27 March 26, 2015;

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