| 1 | PERKINS COIE LLP | |
|----|--|--|
| 2 | BRIAN P. HENNESSY (No. 226721) bhennessy@perkinscoie.com | |
| 3 | J. PATRICK CORRIGAN (No. 240859) pcorrigan@perkinscoie.com | |
| 4 | BROCK S. WEBER (No. 261383) bweber@perkinscoie.com | |
| 5 | 3150 Porter Drive Palo Alto, CA 94304-1212 | |
| 6 | Telephone: 650.838.4300 Facsimile: 650.838.4350 | |
| 7 | Attorneys for Plaintiff | |
| 8 | INDURA SYSTEMS, INC. | |
| 9 | UNITED STATES DISTRICT COURT | |
| 10 | NORTHERN DISTRICT OF CALIFORNIA | |
| 11 | INDURA SYSTEMS, INC., | Case No. 3:14-CV-01255-MMC |
| 12 | Plaintiff, | STIPULATION AND [PROPOSED] |
| 13 | v. | ORDER TO EXTEND THE MEDIATION DEADLINE |
| 14 | Isaac SEOANE, | Trial Date: March 7, 2016 |
| 15 | Defendant. | |
| 16 | | |
| 17 | WHEREAS, counsel for Plaintiff INDURA SYSTEMS INC. and Defendant Isaac | |
| 18 | SEOANE, proceeding <i>pro se</i> , (collectively referred to as the "Parties") have agreed to extend the | |
| 19 | mediation deadline for three months from the previously set mediation deadline of January 23, | |
| 20 | 2015, pursuant to the Court's June 13, 2014 Stipulation and Order Selecting ADR Process and the | |
| 21 | Court's Order on October 27, 2014 (Dkt. No. 31). Under this requested extension, the Parties | |
| 22 | agree to a new mediation deadline of March 23, 2015; | |
| 23 | WHEREAS, the Parties' stipulation to, and request for, this new deadline is supported by | |
| 24 | good cause because such an extension is necessary in light of the withdrawal of Defendant | |
| 25 | Seoane's counsel (see Dkt. No. 38) and attendant mediation scheduling issues; | |
| 26 | /// | |
| 27 | /// | |
| 28 | /// | |
| | | |

| 1 | NOW THEREFORE, IT IS HEREBY STIPULATED by and between the parties hereto a | | |
|----|--|---|--|
| 2 | follows: | | |
| 3 | The Parties stipulate to extend the current media | The Parties stipulate to extend the current mediation deadline from January 23, 2015 to | |
| 4 | 4 March 23, 2015. | March 23, 2015. | |
| 5 | 5 IT IS SO STIPULATED. | | |
| 6 | 6 Dated: January 22, 2015 PERKINS COI | E, LLP | |
| 7 | 7 | | |
| 8 | | erian P. Hennessy | |
| 9 | 9 Brian P. He | nnessy | |
| 10 | 10 Attorneys for INDURA S | YSTEMS, INC. | |
| 11 | 11 | | |
| 12 | Dated: January 22, 2015 DEFENDANT | ISAAC SEOANE | |
| 13 | 13 | | |
| 14 | | saac Seoane | |
| 15 | Defendant I | SAAC SEOANE, pro se | |
| 16 | 16 | | |
| 17 | ATTESTATION PURSUANT TO CIVIL | ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3) | |
| 18 | I Dian D. Hannara attack that a succession is | I Drive D. Hannes and the decrease in the Cities of this decrease has been | |
| 19 | the invalidation of the other desired in the least of | I, Brian P. Hennessy, attest that concurrence in the filing of this document has been | |
| 20 | the Heited States of America that the formation is torse | obtained from each of the other signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 22 | |
| 21 | 2015 in Dala Alta California | and correct. Executed on January 22. | |
| 22 | By/s/_ | Brian P. Hennessy | |
| 23 | | nnessy | |
| 24 | | | |
| 25 | | | |
| 26 | | | |
| 27 | | | |
| 28 | 20 , , , , | | |

| 1 | ORDER |
|----|---|
| 2 | DUDGIJANT TO THE DADTIES STIDIJI ATION IT IS HEDEDY ODDEDED (1.4.4) |
| 3 | PURSUANT TO THE PARTIES STIPULATION, IT IS HEREBY ORDERED that the |
| 4 | current mediation deadline of January 23, 2015 is extended to March 23, 2015. |
| 5 | IT IS SO ORDERED. |
| 6 | DATED: January <u>23</u> , 2015 |
| 7 | |
| 8 | Mafine M. Chebry HONORABLE MAXINES. CHESNEY |
| 9 | UNITED STATES DISTRICT JUDGE |
| 10 | |
| 11 | |
| 12 | |
| 13 | |
| 14 | |
| 15 | |
| 16 | |
| 17 | |
| 18 | |
| 19 | |
| 20 | |
| 21 | |
| 22 | |
| 23 | |
| 24 | |
| 25 | |
| 26 | |
| 27 | |
| 28 | |