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Attorney for Plaintiff
ALEXANDRA POLAKOVIC

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ALEXANDRA POLAKOVIC, an individual,

Plaintiff,

v.

ELECTRONIC DOCUMENT PROCESSING, INC., a California corporation; PRESCOTT WOODFORD, individually and in his official capacity, et al.,

Defendants.

_____/

Case No. C 3:14-cv-03424 MEJ

STIPULATION WITH ~~PROPOSED~~ ORDER TO EXTEND TIME TO ANSWER INITIAL COMPLAINT, AND TO CONTINUE FRCP 26(f) AND ADR DEADLINES AND CASE MANAGEMENT CONFERENCE

L.R. 6-2

Judge: Hon. Maria-Elena James
Ctrm : Courtroom B, 15th Floor
Loc'n : 450 Golden Gate Avenue
San Francisco CA 94102

Pursuant to L.R. 6-2, Plaintiff, ALEXANDRA POLAKOVIC, and Defendants, ELECTRONIC DOCUMENT PROCESSING, INC. and PRESCOTT WOODFORD, stipulate to the following:

1. Defendant ELECTRONIC DOCUMENT PROCESSING, INC. ("EDP") was served the summons, complaint and other documents on 9/18/2014;

2. Defendant PRESCOTT WOODFORD was served the summons, complaint and other documents on 9/22/2014;

3. Jonathan Blute of Murphy Pearson Bradley & Feeney was just retained to represent Defendants, and contacted James Michel, Attorney for Plaintiff, on 10/7/2014;

4. The reason for the delay is that Defendants were clarifying various issues related to insurance coverage;

5. EDP will take up the defense of WOODFORD as its employee;

6. Because Counsel for Plaintiff mailed Notice of a Lawsuit and Request to Waive Service of Summons with the Waiver of Summons forms on 7/31/2014 to both defendants, and neither defendant returned the signed Waiver of Summons after more than thirty days, plaintiff was forced to engage registered process servers and incurred $100 for service of EDP and $105 for service of WOODFORD;

7. EDP has agreed to reimburse Plaintiff for charges incurred for service of defendants and will do so by sending a check in the amount of $205 made payable to Plaintiff's counsel by 10/31/2014;

8. Counsel for Defendants has requested an extension of time until 11/7/2014 to respond to the complaint;

9. Plaintiff has agreed to extend time for Defendants to respond to the initial complaint so long as the Court agrees and extends the FRCivP 26(f) and ADR Deadlines, and Initial Case Management Conference currently scheduled for 10/30/2014;

10. No previous agreements to extend time have been made;

11. The requested time modification would require that the Court continue the deadlines and dates as listed in the Order Setting Initial Case Management Conference and ADR Deadlines accordingly;

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12. Pursuant to the foregoing, the parties request that the Court extend Defendants' time to file the response to the initial complaint to 11/7/2014 and that the Court cancel the Order Setting Initial Case Management Conference and ADR Deadlines and issue a new Order.

DATED: October 10, 2014

/s/ James A. Michel
JAMES A. MICHEL
Attorney for Plaintiff
ALEXANDRA POLAKOVIC

DATED: October 10, 2014

JONATHAN M. BLUTE
Murphy, Pearson, Bradley & Feeney
Attorneys for Defendants
ELECTRONIC DOCUMENT PROCESSING, INC. and PRESCOTT WOODFORD

The Case Management Conference is CONTINUED to December 4, 2014 at 10:00 a.m. All deadlines are adjusted accordingly.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: October 10, 2014

HON. MARIA ELENA JAMES
UNITED STATES MAGISTRATE JUDGE