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James A. Michel
State Bar No. 184730
2912 Diamond St. #373
San Francisco CA 94131
415/ 239-4949
(Fax 239-0156)
attyjmicel@gmail.com

Attorney for Plaintiff
ALEXANDRA POLAKOVIC

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

ALEXANDRA POLAKOVIC, an
individual,

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

Plaintiff,

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

v.

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

L.R. 6-2

Defendants.

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

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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;

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

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

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

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

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

16 8. Counsel for Defendants has requested an extension of time until
17 11/7/2014 to respond to the complaint;

18 9. Plaintiff has agreed to extend time for Defendants to respond to the initial
19 complaint so long as the Court agrees and extends the FRCivP 26(f) and ADR
20 Deadlines, and Initial Case Management Conference currently scheduled for
21 10/30/2014;

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

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

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