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 GERARDO HERNANDEZ

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 8 *\* Defendant's counsel listed after the caption*

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 11 UNITED STATES DISTRICT COURT  
 12 FOR THE NORTHERN DISTRICT OF CALIFORNIA

13 GERARDO HERNANDEZ,  
 14 Plaintiff,

Case No. 3:14-cv-05317 RS

Civil Rights

15 v.

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO CONTINUE DEADLINE  
 TO MEDIATE UNDER GENERAL  
 ORDER 56**

16 SAN MATEO COUNTY COMMUNITDY  
 COLLEGE DISTRICT (CANADA  
 17 COLLEGE); DOES 1-10, inclusive,  
 18 Defendant.

Action Filed: December 4, 2014

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 20 JOHN C. BEIERS, COUNTY COUNSEL (State Bar No. 144282)  
 KATHRYN E. MEOLA, ESQ. (State Bar No. 172034)  
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25 Attorneys for Defendant  
 26 SAN MATEO COUNTY COMMUNITY  
 COLLEGE DISTRICT  
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**STIPULATION**

Plaintiff GERARDO HERNANDEZ (“Plaintiff”) and defendant SAN MATEO COUNTY COMMUNITY COLLEGE DISTRICT (“Defendant”) – Plaintiff and Defendant together the “Parties” -- hereby stipulate and request that the Court extend the deadline for the Parties to mediate under General Order 56. The Parties do so based on the following Good Cause:

1. Plaintiff filed his action on December 4, 2014.
2. The subject property is Canada College, a large college campus located in Redwood City, California.
3. The Parties have been working cooperatively within the parameters of General Order 56 to resolve Plaintiff’s claims, including conducting a joint site inspection on April 21, 2015 and April 22, 2015.
4. Plaintiff issued an injunctive relief demand and disclosed his access consultant’s report to Defendant on June 22, 2015. Based on the report of Plaintiff’s access consultant, Plaintiff alleges many issues related to disabled access at the subject property.
5. Plaintiff filed a Notice of Need for Mediation on July 6, 2015. Docket No. 19.
6. The case was referred to mediation on July 10, 2015, and assigned a mediator on August 26, 2015. Docket No. 20.
7. Since that time, the Parties have continued to negotiate the settlement of injunctive relief.
8. The Parties have scheduled an in-person meet and confer, which will include all counsel, Defendants’ representatives, and the Parties’ access consultants on September 22, 2015.
9. During a pre-mediation teleconference with the assigned General Order 56 mediator, The Honorable James Lambden (Ret.), on September 14, 2015, the mediator and the Parties tentatively agreed to a mediation date of October 29, 2015.

1           10.     Presently, the deadline to mediate under General Order 56 is October 5, 2015.

2           To keep costs down in this case and to facilitate efficient resolution of the case through  
3 mediation and the General Order 56 process, the Parties therefore stipulate and request that the  
4 Court Order the deadline for mediation to take place under General Order 56 be extended to  
5 November 20, 2015.

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7                               **IT IS SO STIPULATED.**

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9     Dated: September 17, 2015

LAW OFFICES OF PAUL L. REIN

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          /Catherine Cabalo            
By: CATHERINE CABALO, ESQ.  
Attorneys for Plaintiff  
GERARDO HERNANDEZ

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14     Dated: September 16, 2015

SAN MATEO COUNTY COUNSEL

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          /s/ Kristina Paszek            
By: KRISTINA PASZEK, ESQ.  
Attorneys for Defendant  
SAN MATEO COUNTY COMMUNITY  
COLLEGE DISTRICT

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**ORDER**

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For GOOD CAUSE SHOWN and for the reasons set forth above, the deadline for the  
parties to complete mediation through General Order 56 shall be November 20, 2015.

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**IT IS SO ORDERED.**


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Dated:   9/18  , 2015

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Honorable Richard Seeborg  
United States District Court Judge

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**FILER'S ATTESTATION**

Pursuant to Local Rule 5-1, I hereby attest that on September 16, 2015, I, Catherine Cabalo, attorney with The Law Office of Paul L. Rein, received the concurrence of Kristina Paszek, counsel for Defendant, in the filing of this document.

/s/ Catherine Cabalo  
Catherine Cabalo