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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ROBYN BLASCO,  
Plaintiff,

vs.

ATRIUM MEDICAL CORPORATION,  
GETINGE GROUP, GETINGE USA, INC.,  
MAQUET CARDIOVASCULAR, LLC, AND  
DOES 1-20,  
Defendants.

Case No. 3:15-cv-02468-WHA

Honorable William H. Alsup

**JOINT STIPULATION EXTENDING  
TIME TO COMPLETE MEDIATION**

N.D. ADR Local Rule 6-5

Complaint Filed: June 22, 2014  
SAC Filed: May 12, 2015

Case Removed: June 3, 2015

1           **TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF**  
2 **RECORD:**

3           PLEASE TAKE NOTICE that Plaintiff Robyn Blasco and Defendants Atrium Medical  
4 Corporation, Maquet Cardiovascular, LLC, Getinge USA, Inc., and Getinge AB (improperly named  
5 in the Complaint as Getinge Group) (collectively, Defendants), through their respective counsel of  
6 record, jointly stipulate, pursuant to ADR L.R. 6-5, to extend the time by which the parties must  
7 conduct mediation. The parties enter into this stipulation based on the following facts and  
8 representations.

9           1.       On September 28, 2015, the Case Management Order and Reference to ADR Unit for  
10 Mediation was entered in this case. Pursuant to ADR L.R. 6-4, the mediation in this matter must be  
11 held on or before December 23, 2015.

12           2.       On October 28, 2015, the parties participated in the pre-mediation conference call  
13 with court-appointed mediator, Eric Danoff, at which the difficulty of conducting a meaningful  
14 mediation by the December 23, 2015 deadline was discussed.

15           3.       In this medical products liability action, the Plaintiff's medical records are necessary  
16 and germane to determining whether liability may exist and assessing the value of the case. Due to  
17 the external time frame involved in receiving medical authorizations, submitting the requests to  
18 Plaintiff's numerous medical providers, following up with the medical providers to receive Plaintiff's  
19 medical records, and having the medical records evaluated in preparation for the mediation, a  
20 December 23, 2015 deadline is impracticable. It typically can be up to 30 days to receive a response  
21 and/or medical records from the providers.

22           4.       Without the benefit of Plaintiff's medical records to assess the value of the case to  
23 both parties, the likelihood of success at the mediation is significantly lessened. Thus, a relatively  
24 brief extension of time in which to mediate would enhance the mediation experience.

25           5.       This stipulation represents the first extension of time to mediate, and will not  
26 prejudice either party.

27           6.       Good cause exists to extend the mediation deadline because the extension will permit  
28 the parties to engage in a meaningful mediation.

1           7.       The parties have agreed to selected mediation dates up through and including January  
2 26, 2016.

3           8.       Based on the following representations, the parties jointly stipulate to extend the time  
4 by which the parties must conduct mediation to January 26, 2016.

5  
6 DATED: November 4, 2015

**AKERMAN LLP**

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8 By: :\_\_\_/s/ Karen P. Ciccone\_\_  
9 Karen Palladino Ciccone  
10 Hugh J. Turner Jr. (admitted pro hac vice)  
11 Enjoliqué D. Aytch (admitted pro hac vice)  
12 Attorneys for Defendants Atrium Medical Corporation,  
13 Getinge AB (improperly named in the Complaint as  
14 Getinge Group), Getinge USA, Inc., Maquet  
15 Cardiovascular, LLC

16  
17 DATED: November 4, 2015

**KELLER, FISHBACK & JACKSON LLP**

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19 By:\_\_\_/s/ Dan C. Bolton\_\_\_\_\_  
20 Dan C. Bolton  
21 Attorneys for Plaintiff  
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**UNITED STATES DISTRICT COURT  
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ROBYN BLASCO,  
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vs.

ATRIUM MEDICAL CORPORATION,  
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DOES 1-20,  
Defendants.

Case No. 3:15-cv-02468-WHA

Honorable William H. Alsup

**[PROPOSED] ORDER**

N.D. ADR Local Rule 6-5

Complaint Filed: June 22, 2014  
SAC Filed: May 12, 2015

Case Removed: June 3, 2015

This matter is before the Court on the Joint Stipulation Extending Time to Complete Mediation filed by Plaintiff Robyn Blasco and Defendants Atrium Medical Corporation, Maquet Cardiovascular, LLC, Getinge USA, Inc., and Getinge AB (improperly named in the Complaint as Getinge Group).

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1           Having read and considered the papers filed in this action and in connection with the Joint  
2 Stipulation Extending Time to Complete Mediation, and good cause appearing, the Court hereby  
3 orders as follows:

- 4           1.       The parties' Joint Stipulation Extending Time to Complete Mediation is **GRANTED**.
- 5           2.       The parties shall have through and including January 26, 2016 to conduct mediation  
6 in this matter.

7           **IT IS SO ORDERED.**

8  
9 Dated: November 9, 2015

  
\_\_\_\_\_  
WILLIAM ALSUP  
UNITED STATES DISTRICT JUDGE