

1 N. Maxwell Njelita (SBN 200772)
 2 NJELITA LAW OFFICES
 3 436 Fourteenth Street, Suite 1107
 4 Oakland, California 94612
 Telephone: (510) 465-7500
 Facsimile: (510) 465-7501
 Email: mnjelita@nmnlaw.com

5 Attorney for Defendants
 6 BARRERA & ASSOCIATES CONSTRUCTION, INC.;
 7 WILLIAM ISRAEL BARRERA; HERSON ISRAEL BARRERA

8 Tomas E. Margain (SBN 193555)
 9 Huy Tran (SBN 288196)
 10 JUSTICE AT WORK LAW GROUP
 11 84 West Santa Clara Street, Suite 790
 12 San Jose, CA 95113
 Telephone (408) 317-1100
 Facsimile: (408) 351-0105
 Email: Tomas@JAWLawGroup.com
Huy@JAWLawGroup.com

13 Attorneys for Plaintiffs
 14 FRANCISCO NAVA; ENRIQUE LOPEZ; and
 15 JORGE L. SANCHEZ

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

19 FRANCISCO NAVA; ENRIQUE LOPEZ;) Case No. 4:15-cv-03235-HSG
 20 and JORGE L. SANCHEZ,)

21 Plaintiffs)

22 vs.)

23 BARRERA & ASSOCIATES)
 24 CONSTRUCTION, INC.; WILLIAM)
 ISRAEL BARRERA; HERSON ISRAEL)
 BARRERA,)

25 Defendants.)

**STIPULAITON AND ORDER TO
 CONTINUE CASE MANAGEMENT
 CONFERENCE AND EXTEND
 PRESUMPTIVE DEADLINE FOR
 MEDIATION**

1
2 THE Parties through their respective attorneys of record hereby stipulate and agree as
3 follows:

- 4 1. On September 11, 2015, this Court ordered the parties to mediation with a
5 presumptive 90 day deadline on or for mediation to be completed by December 10,
6 2015.
- 7 2. On September 24, 2015, this Court's ADR Department assigned Judith Droz
8 Keyes as the mediator.
- 9 3. On October 13, 2015, the Court held an initial Case Management Conference and
10 continued the matter for a further case management conference set for December
11 15, 2015. DKT. 15
- 12 4. On October 15, 2015, the parties conferred with Ms. Keyes and selected
13 November 24, 2015 as the date for mediation.
- 14 5. On November 15, 2015, Plaintiffs' counsel requested that the mediation be
15 continued a week or two to be able to finish an audit to share and use at mediation.
- 16 6. The parties and the mediator are available to mediate the matter on December 15,
17 2015 and have tentatively calendared that date subject to the Court's approval.
- 18 7. The parties seek an extension of five days or to December 15, 2015 to hold the
19 mediation. The parties further seek a three week continuance of the Further Case
20 Management Conference from December 15, 2015 to January 6, 2016 (Tuesday).
21 This would allow the parties enough time to file a status statement a week prior to
22 the further Case management Conference if the matter is not resolved.

22 IT IS SO STIPULATED

23 Respectfully submitted,

24 Dated: NJELITA LAW OFFICES

25 By: /s/ N. Maxwell Njelita

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

N. Maxwell Njelita
Attorney for Defendants
BARRERA & ASSOCIATES
CONSTRUCTION, INC.; WILLIAM
ISRAEL BARRERA; and HERSON
ISRAEL BARRERA

Dated: JUSTICE AT WORK LAW GROUP

By: ___/s/ Tomas E. Margain_____
Tomas E. Margain
Huy Tran
Attorney for Plaintiffs
FRANCISCO NAVA;
ENRIQUE LOPEZ; and
JORGE L. SANCHEZ

ORDER


BASED ON THE PARTIES STIPULAITON AND GOOD CAUSE SHOWN, THE
COURT ORDERS AS FOLLOWS:

The deadline to mediate this matter is extended through December 15, 2015.

The further Case Management Conference currently set for December 15, 2015 at 2:00
pm is continued to January 5, 2016 at 2:00 pm in this department. A joint updated statement is
are due one week prior to the further Case Management Conference is the matter has not
resolved.

IT IS SO ORDERED

Dated: 11/19/2015


Hon. Haywood S. Gilliam Jr.
United States District Court Judge