1 2 3	JAMES V. FITZGERALD, III (State Bar No. 55632) NOAH G. BLECHMAN (State Bar No. 197167) ELIZABETH M. DOOLEY (State Bar No. 289510) McNamara, Ney, Beatty, Slattery, Borges & Ambacher LLP 1211 Newell Avenue Walnut Creek, CA 94596 Telephone: (925) 939-5330 Facsimile: (925) 939-0203	
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6 7	Attorneys for Defendant CITY OF SAN RAMON	
8	UNITED STATES DISTRICT COURT	
9	NORTHERN DISTRICT OF CALIFORNIA	
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11	ODIS WILLIAM CHENAULT, JR.,	Case No. C15-03662 SK
12	Plaintiff,	STIPULATION AND ORDER
13	vs.	CONTINUING DEADLINE FOR MEDIATION
14	CITY OF SAN RAMON, SAN RAMON POLICE DEPARTMENT, AND JOHN	
15 16	DOES NUMBERS 1 THROUGH 4 (IN OFFICIAL AND INDIVIDUAL CAPACITIES),	
17	Defendants.	
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19	IT IS HEREBY STIPULATED AND AGREED, by and between the parties to this action,	
20	through their respective counsel of record, as follows:	
21	WHEREAS the parties are respectfully requesting that the Court continues the deadline	
22	for mediation for several months, until after the parties have had sufficient time to conduct	
23	discovery and go forward with mediation.	
24	WHEREAS currently this matter has a deadline to mediate this case by essentially April	
25	12, 2016. (See ECF 27).	
26	WHEREAS the parties and mediator have agreed on a tentative mediation date of May 17,	
27	2016, which was set to give the parties some time for discovery and per the availability of counsel	
28	and the mediator. STIPULATION AND ORDER CONTINUING DEADLINE FOR MEDIATION C15-03662 SK	

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1 WHEREAS the parties need some time for discovery before mediation can go forward. 2 As such, the parties jointly request the Court set the new mediation deadline to May 31, 2016. 3 Our assigned mediator, Mr. Randy Hall, agrees with the timing as set forth herein. 4 WHEREAS good cause exists to continue the mediation deadline. 5 The parties attest that concurrence in the filing of this document has been obtained from 6 each of the other Signatories, which shall serve in lieu of their signatures on the document. 7 IT IS SO STIPULATED 8 Dated: March 4, 2016 MCNAMARA, NEY, BEATTY, SLATTERY, 9 BORGES & AMBACHER LLP 10 By: /s/ Noah G. Blechman James V. Fitzgerald, III / Noah G. Blechman Elizabeth M. Dooley 11 Attorneys for Defendant 12 CITY OF SAN RAMON 13 Dated: March 4, 2016 LAW OFFICES OF MARK KELSEY 14 By: /s/ Mark Kelsey Mark Kelsey, Attorney for Plaintiff **ODIS CHENAULT** 15 16 <u>ORDER</u> 17 PURSUANT TO THE FOREGOING STIPULATION, THE COURT ORDERS AS 18 **FOLLOWS:** 19 The mediation deadline is continued to May 31, 2016. 20 IT IS SO ORDERED 21 22 Dated: March 4, 2016 23 United States Magistrate Judge 24 25 26