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6
 7 **UNITED STATES DISTRICT COURT**
 8 **NORTHERN DISTRICT OF CALIFORNIA**

9)	
10)	Case Number: 3:15-cv-03677-EDLRS
11)	STIPULATION AND PROPOSED
12)	ORDER TO EXTEND MEDIATION AND
13)	DISCOVERY DEADLINES AS
14)	AMENDED BY COURT
15)	
16)	
17)	

MOHAMMAD SHARIFI
 Plaintiff,
 vs.
 ELITE LINE SERVICES, LLC, a limited
 liability company; KEN FOWLER, an
 individual; PATTY NIEKAMP, an individual;
 and DOES 1 through 25, inclusive
 Defendants.

19 Plaintiff Mohammad Sharifi, by and through their counsel of record, The Law Office of
 20 Yousef J. Totah, and Defendants Elite Line Services, LLC, Ken Fowler, and Patty Niekamp, by
 21 and through their counsel of record, Masuda, Funai, Eifert & Mitchell, LTD., hereby enter into
 22 the below stipulation to continue the mediation and discovery deadlines in this matter.

23 This stipulation is made in consideration of the fact that the parties have been actively
 24 engaged in discovery, but need additional time to complete further written discovery, mediation,
 25 and depositions. The parties engaged in mediation February 16, 2016, but the case did not settle.
 26 The parties have agreed to continue further facilitated discussions and continue mediation. The
 27 parties have agreed to continue mediation with Mr. Baldwin Lee on March 21, 2016.
 28

1 Based on the foregoing, the parties submit that there is good cause to continue the
2 mediation completion deadline and all discovery dates by at least 60 days. This would move the
3 mediation completion date from March 19, 2016 to May 19, 2016. This would move the non-
4 expert discovery cutoff from April 19, 2016 to June 19, 2016. This would move the date to
5 disclose experts (retained and non retained) from February 19, 2016 to April 19, 2016. This
6 would move the date to disclose supplemental and rebuttal experts from March 19, 2016 to May
7 19, 2016. This would move the date of all expert discovery from April 19, 2016 to June 19,
8 2016. This would move the date to submit all dispositive pretrial motions from July 21, 2016 to
9 September 19, 2016. This would move the date of a further case management conference from
10 April 21, 2016 to June 23, 2016.

11 The parties hereby stipulate that the Case's Management Order and Pretrial Order may be
12 amended as set forth below.

13
14 Dated: __03/04/2016_____

THE LAW OFFICE OF YOUSEF J. TOTAH

15
16 By: _____/s/ _Yousef J. Totah_____

17 Yousef J. Totah

18 Attorney for Plaintiff Mohammad Sharifi

19
20 Dated: __03/04/2016_____

MASUDA, FUNAI, EIFERT & MITCHELL, LTD.

21
22 By: _____/s/ _Asa _Markel_____

23 Asa Markel

24 Alan Kaplan

25 Attorneys for Elite Line Services, LLC; Ken

26 Fowler; and Patty Niekamp

1 **ORDER**

2
3 Based on the foregoing stipulation, the mediation completion date of March 19, 2016, is
4 off calendar. The new mediation completion date is May 19, 2016.

5 The non-expert discovery cutoff date of April 19, 2016, is off calendar. The new
6 non-expert discovery cutoff date is June 19, 2016.

7
8 The date to disclose experts (retained and non-retained) of February 19, 2011, is off
9 calendar. The new date to disclose experts (retained and non-retained) is April 19, 2016.

10 The date to disclose supplemental and rebuttal experts of March 19, 2016, is off calendar.
11 The new date to disclose supplemental and rebuttal experts is May 19, 2016

12 The expert discovery cutoff deadline of April 19, 2016, is now off calendar. The new
13 expert discovery cutoff deadline is June 19, 2016.

14
15 The cutoff date to submit all dispositive pretrial motions of July 21, 2016, is off calendar.
16 The ~~new~~ last date to ~~submit~~ hear all dispositive pretrial motions is ~~September 19, 2016~~
17 September 22, 2016.

18 The further case management conference date of April 21, 2016, is off calendar. The new
19 further case management conference date is June 23, 2016

20
21 **IT IS SO ORDERED.**

22
23
24 Dated: March 4, 2016



25 UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2016, the foregoing STIPULATION AND [PROPOSED] ORDER TO EXTEND MEDIATION AND DISCOVERY DEADLINES was filed electronically, and served automatically upon opposing counsel by operation of the Court's electronic filing system.

_____/s/____Yousef J. Totah_____

Yousef J. Totah, Esq. (California Bar # 296759)

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