1 Mark E. Ellis - 127159 Andrew M. Steinheimer - 200524 2 Amanda F. Riley - 284440 ELLIS LAW GROUP LLP 3 740 University Avenue, Suite 100 Sacramento, CA 95825 4 Tel: (916) 283-8820 Fax: (916) 283-8821 mellis@ellislawgrp.com asteinheimer@ellislawgrp.com 6 ariley@ellislawgrp.com 7 Attorneys for Defendant LEGAL EXPRESS, LTD. 8 UNITED STATES DISTRICT COURT 9 10 NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION 11 12 13 LISA MARIE DITLEVSON. Case No.: 3:15-cv-03977 MMC 14 Plaintiff, JOINT STIPULATION AND ORDER TO EXTEND TIME TO COMPLETE 15 MEDIATION 16 LEGAL EXPRESS, LTD., a California [ADR Local Rule 6-5] corporation, KRAIG VORSATZ, individually and in his official capacity; and DOES 1 through 17 10, inclusive, 18 Defendants. 19 20 The Court's Order dated November 25, 2015 (Dkt. No. 22) adopted the Parties' Stipulation and 21 [Proposed] Order Selecting Mediation pursuant to Civil Local Rule 16-8 and ADR Local Rule 3-5 22 (Dkt. No. 20), selecting the ADR process for this case using mediation to be completed before March 23 3, 2016. 24 The Parties have discussed the deadline, and have agreed that the mediation deadline is 25 unrealistic given the parties' own informal and formal discovery timelines. Plaintiff is conducting its 26 own investigation of the facts and Defendant Legal Express, Ltd. is still determining whether or not it 27 will seek formal discovery responses at this time. 28 -1-

JOINT STIPULATION AND ORDER TO EXTEND TIME TO COMPLETE MEDIATION

	On February 16, 2016, the Parties completed the joint whom conference with mediate. I illian
1	On February 16, 2016, the Parties completed the joint phone conference with mediator Lillian
2	Stenfeldt as prescribed by ADR Local Rule 6-6. During this pre-mediation conference, a potential
3	conflict was determined by Ms. Stenfeldt, and she has recused herself as the assigned mediator. (Dkt.
4	No. 35.)
5	On February 19, 2016, mediator Mark H. Penskar was appointed as the parties' mediator. (Dkt.
6	No. 36.)
7	Accordingly, the Parties hereby stipulate and respectfully request the Court to order that the
8	deadline for completing mediation shall be extended from March 3, 2016 to a date that is at least sixty
9	(60) days from the current mediation deadline.
10	There has been no previous modification of the deadline for completing the mediation. The
11	requested time modification would have no effect on the schedule for this case other than the date
12	requested to be changed.
13	IT IS SO STIPULATED.
14	Dated: February 23, 2016
15	ELLIS LAW GROUP, LLP
16	By <u>/s/ Amanda</u> F. Riley
17	Amanda F. Riley Attorney for Defendant
18	LEGAL EXPRESS, LTD.
19	Dated: February 23, 2016
	CONSUMER LAW CENTER, INC.
20	
21	By <u>/s/ Fred W. Schwinn</u> Fred W. Schwinn
22	Attorney for Plaintiff LISA MARIE DITLEVSON
23	
24	PURSUANT TO STIPULATION, IT IS SO ORDERED.
25	Specifically, the deadline for the parties to complete mediation is hereby EXTENDED to
26	May 2, 2016.
27	Dated: February 23, 2016 Making M. Cheller The Honorable Maxine M. Cheller
28	United States District Judge