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Attorneys for Defendant
 UNIVERSITY OF PHOENIX, INC.

**IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA**

BAHAR MIKHAK, an individual,
 Plaintiff,
 v.
 UNIVERSITY OF PHOENIX INC., an
 Arizona corporation,
 Defendant.

Case No. 3:16-cv-00901-CRB

**JOINT STIPULATION TO MODIFY
 MOTION BRIEFING SCHEDULE AND
 ORDER**

Hearing Date: June 17, 2016
 Time: 8:30 AM
 Courtroom: 6. 17th Floor
 Judge: Honorable Charles R. Breyer

1 **WHEREAS**, on April 25, 2016, Defendant University of Phoenix ("Defendant") filed a Notice of
2 Motion and Motion to Compel Arbitration and to Dismiss ("Motion to Compel") Plaintiff's
3 Complaint ("Complaint") or, in the alternative to this Action ("Motion to Compel"), where it
4 noticed a hearing date of June 17, 2016, before the Honorable Charles R. Breyer.

5
6 **WHEREAS**, pursuant to Civil L.R. 7-3 of the Local Rules of Practice in Civil Proceedings
7 before the United States District Court for the Northern District of California, the present deadline
8 for Plaintiff to file and serve her Opposition to the Motion to Compel is May 9, 2017 and the
9 deadline for Defendant to file and serve its Reply is presently May 16, 2016.

10
11 **WHEREAS**, Plaintiff's counsel, Howard Moore, Jr., returned to Atlanta Georgia over the
12 weekend of April 30, 2016 to attend a funeral, and therefore, his time to address the issues
13 presented by Defendant's Motion has been severely curtailed.

14
15 **WHEREAS**, Plaintiff's counsel William C. McNeill, III, also had a long schedule trip planned to
16 the East Coast and therefore, his time to address Defendant's motion has also been severely
17 curtailed.

18
19 **NOW THEREFORE**, Plaintiff Bahar Mikhak and Defendant, by and through their undersigned
20 counsel, **HEREBY STIPULATE AND AGREE AS FOLLOWS:**

- 21
- 22 1. Plaintiff is afforded an extension, until May 20, 2016, to file and serve her
23 Opposition to the Motion to Dismiss Plaintiff's Complaint;
 - 24 2. Defendant is afforded an extension, until June 3, 2016, to file and serve its Reply
25 to Plaintiff's Opposition to the Motion to Dismiss Plaintiff's Complaint.

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IT IS SO STIPULATED.

Dated: May 5, 2016

/s/ Neda N. Dal Cielo
NEDA N. DAL CIELO
LITTLER MENDELSON
A Professional Corporation
Attorneys for Defendant UNIVERSITY OF
PHOENIX, INC.

Dated: May 5, 2016


/s/ William C. McNeill, III
WILLIAM C. McNEILL, III
NOAH A. PHILLIPS
LEGAL AID SOCIETY –
EMPLOYMENT LAW CENTER
Counsel for Plaintiff BAHAR MIKHAK

Dated: May 5, 2016

/s/ Howard Moore, Jr.
HOWARD MOORE, JR.
MOORE & MOORE
Counsel for Plaintiff BAHAR MIKHAK

IT IS SO ORDERED.

Dated: May 6, 2016



CHARLES R. BREYER
SENIOR UNITED STATES DISTRICT JUDGE

GENERAL ORDER 45 ATTESTATION

In accordance with General Order 45, concurrence in the filing of this document has been obtained from each of the signatories, and I shall maintain records to support this concurrence for subsequent production for the court if so ordered or for inspection upon request by a party.

/S/ William C. McNeill, III
William C. McNeill, III

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