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6 Attorneys for Defendant,
 7 SEIU, UNITED HEALTHCARE WORKERS-WEST

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

11 SHAREEFAH JOSEPH,

12 Plaintiff,

13 v.

14 SEIU, UNITED HEALTHCARE WORKERS-
 15 WEST,

16 Defendant.

No. 3:16-cv-01644-EMC

**STIPULATED REQUEST TO EXTEND
 DEADLINE FOR CONDUCTING
 MEDIATION; AND PROPOSED
 ORDER**

18
 19 Pursuant to ADR L.R. 6-7 and L.R. 7-12, Plaintiffs and Defendant seek to extend the time
 20 for conducting mediation in this matter. The considerations supporting the request, as stipulated,
 21 are set forth below:

22 The Parties voluntarily agreed to conduct a private mediation in this dispute to determine
 23 whether settlement may be achieved without the necessity for further litigation. The Parties
 24 agreed to delay discovery until after final adjudication of Defendant’s Motion to Dismiss pursuant
 25 to FRCP 12(b)(6). On July 21, 2016, during the Case Management Conference and hearing on
 26 Defendant’s Motion to Dismiss, the Court ordered that private mediation was to be completed
 27 within one-hundred and fifty (150) days from the date of that hearing. The Court subsequently
 28 entered an order partially granting and partially denying Defendant’s Motion to Dismiss, thus

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1 clarifying the disputes subject to further litigation. Plaintiff declined to file an amended
2 complaint, and Defendant filed its Answer on September 14, 2016.

3 The Parties now desire to engage in meaningful discovery for the purpose of facilitating
4 settlement prior to any mediation. The mediator selected by the Parties is unavailable until after
5 the Court's deadline for conducting mediation—the earliest availability being in December 2016
6 and January 2017. In order to retain the neutral mediator selected by the Parties, and in order to
7 have sufficient opportunity to engage in discovery, and to preserve the Parties' resources and the
8 resources of the Court, the Parties jointly request an extension of the deadline to conduct
9 mediation to January 31, 2017, which is three weeks prior to the Parties' next Case Management
10 Conference.

11
12 Dated: October 7, 2016

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

13
14 By: /S/ BRUCE A. HARLAND
BRUCE A. HARLAND
XOCHITL A. LOPEZ
15 Attorneys for Defendant,
16 SEIU, UNITED HEALTHCARE WORKERS-
17 WEST

18 Dated: October 7, 2016

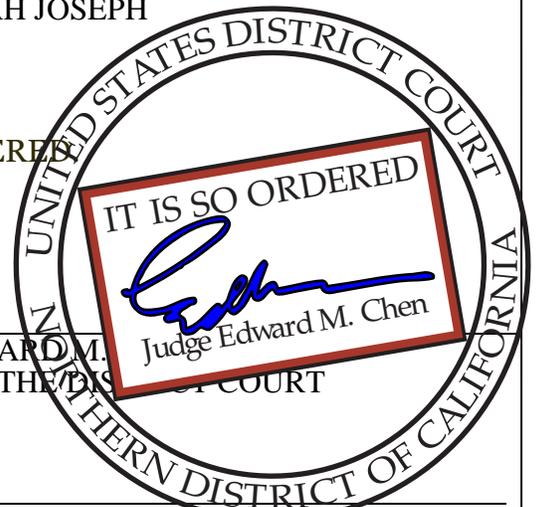
GOYETTE & ASSOCIATES, INC.

19 /S/ GARY G. GOYETTE
20 GARY G. GOYETTE
21 Attorneys for Plaintiff,
22 SHAREEFAH JOSEPH

23 PURSUANT TO STIPULATION IT IS SO ORDERED

24
25 Dated: October 11, 2016

26
27 HON. EDWARD M. CHEN
JUDGE OF THE DISTRICT COURT



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