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5 Attorney for DEFENDANTS,
 6 LINDA J. CURTIS, Trustee of the
 PLKG CURTIS TRUST dated October 4, 2004

7
 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

11 PAMELA KOUSSA

12 Plaintiffs,

13 v.

14 PHILIP J. CURTIS, Trustee of the
 15 PLKG CURTIS TRUST dated October 4,
 2004; LINDA J. CURTIS, Trustee of the
 16 PLKG CURTIS TRUST dated October 4,
 2004; AND DAVID MAGNA, DBA DAVID
 17 MAGNA WORKSHOP,

18 Defendants.

) Case No.: 3:16-CV-02248-MEJ

) JOINT STIPULATION TO STAY FILING
) AND SCHEDULING DEADLINES, AND
) ORDER THEREON

19 COME NOW, THE PARTIES, BY AND THROUGH THEIR ATTORNEYS, and hereby enter
 20 into the following stipulations for the stay of filing and scheduling deadlines due to pending
 21 settlement, with request for this court to adopt the same as the Order of the Court.

- 22 1. The Center for Disability Access represents Plaintiff PAMELA KOUSSA;
- 23 2. Douglas N. Smith of the Law Offices of Douglas N. Smith represents Defendant
- 24 LINDA J. CURTIS, Trustee of the PLKG CURTIS TRUST dated October 4, 2004.
- 25 3. Defendant PHILIP J. CURTIS, Trustee of the PLKG CURTIS TRUST dated October
- 26 4, 2004 is deceased and has been dismissed from the action.
- 27 4. The Parties are working out the material details of settlement.
- 28 5. The settlement negotiated by counsel shall resolve the entire action, and shall result in

1 the dismissal of Defendant DAVID MAGNA, dba DAVID MAGNA WORKSHOP.

2 6. Defendant Curtis' Responsive Pleadings are due July 21, 2016.

3 7. Under the Court's Scheduling Order, issued April 26, 2016, pursuant to General
4 Order 56, ¶¶3, 4, the Last Day for the parties and counsel to hold the joint inspection
5 of the premises is August 8, 2016.

6 8. In the interest of judicial economy and to minimize attorney's fees and costs, the
7 parties wish to stay further proceedings, including the filing of responsive pleadings
8 by Defendants and the Case Schedule, for 30 days, to allow the parties to finalize and
9 effectuate settlement. The parties anticipate the settlement will be completed and a
10 request for dismissal filed by that time.

11 9. The parties request this court approve the above stipulation, staying the deadline for
12 Defendants to respond to the Summons and staying the Case Schedule for 30 days.

13 IT IS SO STIPULATED.

14 Date: July 21, 2016

CENTER FOR DISABILITY ACCESS

15 By: PHYL GRACE
16 PHYL GRACE, SBN 171771
17 PO Box 262490
18 San Diego CA 92196-2490
19 Attorneys for Plaintiff KOUSSA

20 Dated July 21, 2016

LAW OFFICES DOUGLAS N. SMITH INC.
21 By: DOUGLAS N. SMITH
22 DOUGLAS N. SMITH, SBN 78233
23 1207 Coombs Street/ PO Box 760
24 Napa, CA 94559
25 (707) 257-8935
26 Attorney for Defendant CURTIS

ORDER

26 IT IS SO ORDERED.

27 Date: July 22, 2016


28 MARIA-ELENA JAMES
United States Magistrate Judge

1 **I hereby attest that I have on file all holographic signatures corresponding to any**
2 **signatures indicated by a conformed signature (/S/) within this e-filed document.**

3 Dated July 21, 2016

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