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 HOLLAND AMERICA LINE, N.V., COSTCO WHOLESALE
 7 CORPORATION and CARNIVAL CORPORATION

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

FLYNN, DELICH & WISE
 ATTORNEYS AT LAW
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11 GLORIA YOUNG, MARGARET
 CEPHASS-GROSS,
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 13 Plaintiffs,
 14
 15 vs.
 16 HOLLAND AMERICA LINE, N.V., a
 foreign corporation; CARNIVAL
 17 CORPORATION, dba CARNIVAL
 CRUISE LINES, a foreign corporation;
 18 CWC TRAVEL, INC., dba COSTCO
 TRAVEL, a Washington corporation; and
 DOES 1-10,
 19
 20 Defendants.

CASE NO: 3:16-cv-04820 JST
**STIPULATED REQUEST TO
 CONTINUE MEDIATION DEADLINE
 AND ~~PROPOSED~~ ORDER**

21 Plaintiffs GLORIA YOUNG and MARGARET CEPHAS-GROSS (collectively,
 22 “Plaintiffs”), and Defendants HOLLAND AMERICA LINE, N.V., CARNIVAL
 23 CORPORATION dba CARNIVAL CRUISE LINES and CWC TRAVEL, INC. dba COSTCO
 24 TRAVEL (collectively, “Defendants”), by and through their respective counsel, hereby stipulate
 25 as follows pursuant to Civil L.R. 6-2:

- 26 1. By court order, the deadline to complete private mediation is currently set for
 27 July 5, 2017 and the deadline to file a joint mediation statement is set for July 12, 2017 [Dkt.
 28 No. 57];

1 2. The parties have scheduled private mediation with mediator Harris E. Weinberg
2 of Harris E. Weinberg Mediation on September 11, 2017;

3 3. Due to scheduling conflicts between the parties, their respective counsel, and
4 the agreed-upon mediator, September 11, 2017 is the earliest date that the parties are able to
5 complete private mediation;

6 4. The parties and their respective counsel agree that this request for continuance
7 does not result from any lack of diligence on the parties' or counsels' parts;

8 5. Pursuant to Civil L.R. 6-2(a)(2), the parties hereby disclose the following
9 previous time modifications in this case: By stipulation, the parties agreed to extend the time for
10 Defendants to answer Plaintiffs' Complaint from January 11, 2017 to January 25, 2017 [Dkt.
11 No. 53];

12 6. Pursuant to Civil L.R. 6-2(a)(3), the parties note that the deadline for expert
13 disclosures is currently set for September 1, 2017 and the deadline for expert rebuttals is set for
14 September 28, 2017;

15 7. The parties agree that in light of the scheduled mediation, and to conserve
16 litigation fees and costs, good cause also exists for a short continuance of the current expert
17 disclosure and rebuttal deadlines;

18 8. Based on the foregoing, the parties respectfully request that the Court continue
19 the deadline to complete private mediation to September 13, 2017 in order to account for the
20 possibility of a multi-day mediation, and continue the deadline to file a joint mediation statement
21 to September 20, 2017; and

22 9. The parties respectfully request that the Court also continue the deadline for
23 expert disclosures and expert rebuttals to September 27, 2017 and October 24, 2017, respectively,
24 or to dates agreeable to the Court.

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IT IS SO STIPULATED.

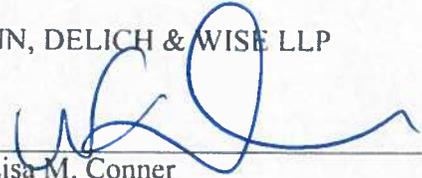
Date: June 13, 2017

LAW OFFICES OF JOHN SCARPINO

By: 
John Scarpino
Law Offices of John Scarpino
Attorneys for Plaintiffs
GLORIA YOUNG, MARGARET
CEPHASS-GROSS

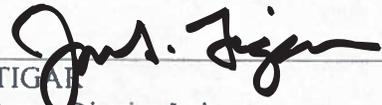
Date: June 13, 2017

FLYNN, DELICH & WISE LLP

By: 
Lisa M. Conner
Norry S. Harn
Attorneys Defendants,
HOLLAND AMERICA LINE, N.V.,
COSTCO WHOLESALE CORPORATION
and CARNIVAL CORPORATION

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 14 _____, 2017


JON S. TIGARI
United States District Judge