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10 *[ADDITIONAL COUNSEL CONTINUED ON NEXT PAGE]*

11
 12 **UNITED STATES DISTRICT COURT**
 13 **NORTHERN DISTRICT OF CALIFORNIA**

14
 15 NATIONAL FEDERATION OF THE
 BLIND, on behalf of itself and all others
 16 similarly situated; GREG DEWALL, on
 behalf of himself and all others similarly
 17 situated; RICHIE FLORES, on behalf of
 himself and all others similarly situated;
 18 MICHAEL HINGSON, on behalf of himself
 and all others similarly situated;
 19 MICHAEL RICHARDSON, on behalf of
 himself and all others similarly situated; and
 20 TINA THOMAS, on behalf of herself and all
 others similarly situated,

21 Plaintiffs,

22 v.

23 GREYHOUND LINES, INC., and
 24 FIRSTGROUP AMERICA, INC.,

25 Defendants.
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Case No. 3:17-cv-03368-RS

**JOINT STIPULATION AND MOTION FOR
 EXTENSION OF DEADLINES UNDER
 GENERAL ORDER NO. 56 AND
 SCHEDULING ORDER; ~~PROPOSED~~
 ORDER**

Complaint Filed: June 12, 2017
 Trial Date: None
 District Judge: Hon. Richard Seeborg
 Courtroom: 3, San Francisco

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NATIONAL FEDERATION OF THE BLIND,
12 GREG DEWALL, RICHIE FLORES,
MICHAEL HINGSON, MICHAEL RICHARDSON,
13 and TINA THOMAS

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1 Pursuant to Civil Local Rule 7-11, plaintiffs National Federation of the Blind, Greg Dewall,
2 Richie Flores, Michael Hingson, Michael Richardson, and Tina Thomas (collectively, “Plaintiffs”),
3 on the one hand, and defendants Greyhound Lines, Inc. and FirstGroup America, Inc. (collectively,
4 “Defendants”), on the other hand, by and through their respective counsel, hereby stipulate and
5 move for administrative relief and an extension of the applicable deadlines in the Court’s
6 Scheduling Order (ECF No. 6) and General Order No. 56, as follows:

7 1. Plaintiffs have commenced an action on behalf of a putative class of individuals
8 with visual disabilities, under the Americans with Disabilities Act and other laws, concerning the
9 alleged inaccessibility of the website, www.greyhound.com, and a Greyhound mobile application.

10 2. The Court’s scheduling order applying General Order No. 56 established the
11 following deadlines:

- 12 • September 25, 2017 - Last day for parties and counsel to hold joint inspection of
13 premises, with or without meet-and-confer regarding settlement.
- 14 • 28 days after Joint Site Inspection - Last day for parties to meet and confer in
15 person to discuss settlement.
- 16 • 42 days after Joint Site Inspection - Last day for plaintiff to file a Notice of Need
17 for Mediation.
- 18 • 7 days after mediation - Last day for plaintiff to file Motion for Administrative
19 Relief Requesting Case Management Conference.

20 3. Defendants have proposed a limited extension of the deadlines in the Court’s
21 General Order No. 56 schedule based on the fact that the parties have already engaged in
22 preliminary settlement discussions, that a third-party vendor retained by Defendants has
23 commenced an assessment of the website at issue and advised that such assessment will not be
24 completed until the end of November 2017, and that Defendants believe the proposed limited
25 extension of the applicable deadlines under General Order No. 56 will assist the parties’ ability to
26 engage in meaningful settlement discussions.

27 4. Accordingly, the parties have agreed that the applicable deadlines in the Court’s
28 General Order No. 56 schedule should be extended as set forth below.

1 Therefore, IT IS HEREBY STIPULATED, AGREED AND REQUESTED by the parties,
2 subject to approval by the Court, that the parties' obligations under General Order No. 56 and the
3 Court's Scheduling Order in this matter shall be revised as follows:

- 4 (i) The last day for the parties to conduct the joint inspection and meet and confer
5 conference to discuss settlement shall be **October 25, 2017**.
- 6 (ii) The last day for filing the Notice of Need for Mediation shall be **October 26, 2017**.
- 7 (iii) The last day for the parties to conduct a mediation shall be **December 15, 2017**.
- 8 (iv) The last day for filing a Motion for Administrative Relief Requesting Case
9 Management Conference shall be **December 20, 2017**.

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12 DATED: September 22, 2017
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15 Respectfully submitted,
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17 OGLETREE, DEAKINS, NASH, SMOAK &
18 STEWART, P.C.

19
20 By: /s/
21 Cassandra Payton

22
23 Attorneys for Defendants
24 GREYHOUND LINES, INC., and FIRSTGROUP
25 AMERICA, INC.

26 DATED: September 22, 2017
27
28 TRE LEGAL PRACTICE
ROSEN BIEN GALVAN & GRUNFELD LLP

By: /s/
Anna Levine

Attorneys for Plaintiffs
NATIONAL FEDERATION OF THE BLIND,
GREG DEWALL, RICHIE FLORES, MICHAEL
HINGSON, MICHAEL RICHARDSON and
TINA THOMAS

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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1

I, Cassandra Payton, attest that concurrence in the filing of this Joint Stipulation And Motion For Administrative Relief For Extension Of Deadlines Required Under Scheduling Order And General Order No. 56 has been obtained from the other signatories.

_____/s/_____
Cassandra Payton

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 9/25/17

By: 

The Honorable Richard Seeborg
United States District Judge
Northern District of California