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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

11 FRANCISCA MORALEZ,

12 Plaintiff,

13 vs.

14 HAYWARD MEDICAL MARKET, INC., et
15 al.,

16 Defendants.

) No. 3:17-cv-04466-WHA

) **STIPULATION TO EXTEND DEADLINE**
) **TO COMPLETE JOINT SITE**
) **INSPECTION REQUIRED BY GENERAL**
) **ORDER 56 AND TO CONTINUE CASE**
) **MANAGEMENT CONFERENCE;**
) ~~PROPOSED~~ ORDER AS MODIFIED

18
19 **WHEREAS**, on August 7, 2017, the Court issued its Scheduling Order for Cases
20 Asserting Denial of Right of Access under Americans with Disabilities Act Title II & III (Dkt.
21 4), requiring that Plaintiff, Francisca Moralez (“Plaintiff”), and Defendants, Hayward Medical
22 Market, Inc. and Rajneesh Salwan, Trustee of the Rajneesh Salwan Separate Property Trust
23 (“Trustee”) (Hayward Medical Market, Inc. and Trustee are collectively “Defendants,” and
24 together with Plaintiff, “the Parties”), conduct a joint site inspection of the subject property no
25 later than November 17, 2017;

26 **WHEREAS**, due to scheduling conflicts and Trustee’s present endeavors to include
27 insurance defense counsel in the matter, the Parties are unable to conduct the joint site
28 inspection by the deadline, but have agreed to conduct it on December 13, 2017 at 11:00 a.m.;

STIPULATION TO CONTINUE DEADLINE FOR JOINT SITE INSPECTION; ~~PROPOSED~~ ORDER

1 **WHEREAS**, a Case Management Conference has been set for November 9, 2017 at
2 11:00 a.m. (Dkt. 10);

3 **NOW, THEREFORE**, the Parties stipulate to extend the deadline to conduct the joint
4 site inspection to December 13, 2017, with all dates triggered by that deadline continued
5 accordingly.

6 The Parties additionally respectfully request a continuance the Case Management
7 Conference to a date on or after January 18, 2018 at the Court's convenience so that Trustee can
8 obtain the participation of its insurance defense counsel prior to the Conference.

9 **IT IS SO STIPULATED.**

10 Dated: November 2, 2017

MISSION LAW FIRM, A.P.C.

11
12 /s/ Tanya E. Moore

13 Tanya E. Moore
14 Attorneys for Plaintiff,
Francisca Moralez

15
16 Dated: November 2, 2017

LAW OFFICES OF CHRISTIAN B. GREEN

17
18 /s/ John T. Hill

19 John T. Hill
Attorneys for Defendant,
Hayward Medical Market, Inc.

20
21 Dated: November 2, 2017

WESTON LAW GROUP

22
23 /s/ Ian Bennett-Goldberg

24 Jonathan Black
Ian Bennett-Goldberg
Attorneys for Defendant,
25 Rajneesh Salwan, Trustee of the Rajneesh Salwan
26 Separate Property Trust

1 **ATTESTATION**

2 Concurrence in the filing of this document has been obtained from each of the individual(s)
3 whose electronic signature is attributed above.

4 /s/ Tanya E. Moore _____
5 Tanya E. Moore
6 Attorneys for Plaintiff
7 Francisca Moralez

8 **ORDER**

9 The Parties having so stipulated and good cause appearing,

10 **IT IS HEREBY ORDERED** that the deadline for the Parties to complete the joint site
11 inspection is extended to December ¹~~13~~, 2017, with all dates triggered by that deadline
12 continued accordingly.

13 **IT IS FURTHER ORDERED** that the Case Management Conference is continued to
14 December 7, 2017, ~~2018~~, at 11:00 a.m. in Courtroom 8, 19th Floor, 450 Golden Gate Avenue,
15 San Francisco, before Judge William Alsup. A joint case management statement is due one
16 week prior to the Case Management Conference.

17
18 **IT IS SO ORDERED.**

19
20 Dated: November 6, 2017.



21 HON. WILLIAM ALSUP
22 United States District Judge
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