

1 ANTHONY J. DECRISTOFORO SBN 166171
anthony.decristoforo@ogletree.com
2 PAUL M. SMITH, SBN 306644
paul.smith@ogletree.com
3 OGLETREE, DEAKINS, NASH, SMOAK &
4 STEWART, P.C.
Esquire Plaza
1215 K Street 17th Floor
5 Sacramento, CA 95814
Telephone: 916.840.3150
6 Facsimile: 916.840.3159

7 Attorneys for Defendants CALIFORNIA
CHECK CASHING STORES, LLC

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

11 FRANCISCA MORALEZ

12 Plaintiff,

13 v.

14 CALIFORNIA CHECK CASHING STORES,
LLC dba CALIFORNIA CHECK CASHING;
15 GENIRBERG FAMILY, LLC, dba THE
GENIRBERG FAMILY LIMITED
16 PARTNERSHIP,

17 Defendants.

Case No. 3:17-CV-06141-JST

**JOINT STIPULATION TO EXTEND
DEADLINE TO COMPLETE COURT
ORDERED MEDIATION REQUIRED BY
GENERAL ORDER 56; ~~PROPOSED~~
ORDER**

Complaint Filed: October 26, 2017
Trial Date: None Set

18 Plaintiff Francisca Moralez (“Plaintiff”), and Defendant, California Check Cashing
19 Stores, LLC (“Defendant,” and together with Plaintiff, “the Parties”),¹ by and through their
20 respective counsel, hereby stipulate as follows:

21 1. This action arises out of Plaintiff’s claims that Defendant denied her full and equal
22 access to its public accommodation on account of her disabilities in violation of Title III of the
23 Americans with Disabilities Act (“ADA”) and parallel California law. Plaintiff seeks injunctive
24 relief under federal and California law, as well as damages under California law. This matter
25 therefore proceeds under this district’s General Order 56 which governs ADA access matters.

28 ¹ A Stipulation for Dismissal of the other Defendant, Genirberg Family, LLC, dba The Genirberg Family Limited
Partnership, was filed on March 27, 2018. (Dkt. 24.)

1 2. Pursuant to this district’s General Order 56, the Parties conducted a joint site
2 inspection of the subject property on March 16, 2018. The case was then referred to mediation on
3 April 13, 2018. This Court ordered the Parties to conduct mediation on or before July 12, 2018
4 (Dkt. 25), assigning the matter to Mediator Kari Levine on May 23, 2018. Dkt. 26.

5 3. Despite their best efforts to find a mutually convenient date for mediation prior to
6 the July 12, 2018 deadline, there were no dates prior to that date on which all of the parties and
7 their respective counsel of record were available.

8 4. The parties and mediator have performed an exhaustive review of their respective
9 calendars, and have circulated many potential dates for the mediation. The first date on which all
10 of the parties, their counsel and the mediator are available for mediation is September 11, 2018.

11 5. Accordingly, the Parties stipulate to extend the deadline to conduct mediation to
12 September 11, 2018.

13 **IT IS SO STIPULATED.**

14
15 DATED: July 11, 2018

MISSION LAW FIRM, A.P.C.

16
17 By: /s/ Zachary M. Best
18 Zachary M. Best
19 Attorney for Plaintiff,
Francisca Morales

20 DATED: July 11, 2018

OGLETREE, DEAKINS, NASH, SMOAK
& STEWART, P.C.

21
22 By: /s/ Anthony J. DeCristoforo
23 Anthony J. DeCristoforo
24 Paul M. Smith
Attorneys for Defendant CALIFORNIA
CHECK CASHING STORES, LLC

25 ///

26 ///

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ATTESTATION

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

DATED: July 11, 2018

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

By: /s/ Anthony J. DeCristoforo
Anthony J. DeCristoforo
Paul M. Smith
Attorneys for Defendants CALIFORNIA
CHECK CASHING STORES, LLC

////
////
////
////
////
////
////
////
////
////
////
////
////
////
////
////
////
////
////
////
////

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROPOSED ORDER

The Parties having so stipulated and good cause appearing,

IT IS HEREBY ORDERED that the deadline for the Parties to conduct mediation is extended to September 11, 2018, with all dates triggered by that deadline continued accordingly.

IT IS SO ORDERED.

Dated: July 12, 2018


United States District Judge

34795901.1