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7 Attorneys for D.W. and SHAMON BLUE, Plaintiffs

8 UNITED STATES DISTRICT COURT
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 10 NORTHERN DISTRICT OF CALIFORNIA
 11
 12 SAN FRANCISCO DIVISION

13 D.W., a minor, et al.

14 Plaintiffs,

15 vs.

16 VASONA MANAGEMENT, INC., a
 17 California corporation et al.

18 Defendants
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Case No. 4:18-cv-00195-JST

**STIPULATION AND ~~PROPOSED~~
 ORDER CONTINUING THE
 MEDIATION DEADLINE**

22 IT IS HEREBY STIPULATED by and between Plaintiffs D.W., a minor by and through
 23 his Guardian Ad Litem, Joan Bennet; and Shamon Blue (collectively “Plaintiffs”) and Vasona
 24 Management, Inc. and Catalina Crest, LLC (collectively “Defendants”) by and through their
 25 respective counsel of record that the deadline to conduct Court sponsored mediation in
 26 accordance with General Order 56 and the Court’s Scheduling Order be continued from October
 27 29, 2018 to January 3, 2019. The parties believe that good cause exists based on the following:
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1. Plaintiffs filed this action on January 9, 2018 alleging that Defendants have violated Title III of the Americans with Disabilities Act, the Federal Fair Housing Act and supplemental California statutes. The case was assigned to the provisions of General Order 56.
2. On June 13, 2018 the parties conducted a General Order 56 joint site inspection after obtaining a deadline extension from the Court. (Dkt. 15).
3. The parties have since entered into settlement discussions but not settlement has been reached.
4. On July 31, 2018 Plaintiff requested mediation. (Dkt. 16).
5. On August 9, 2018 the ADR Unit appointed Mark Penskar, Esq. as the mediator. On August 29, 2018 the ADR Unit appointed Robert Pohls, Esq. as the new mediator.
6. Due to Mr. Pohls being ill, the parties did not hold a pre-mediation conference call until October 31, 2018. At the pre-mediation conference call the parties agreed to have the mediation session on January 3, 2018, the earliest date available for everyone involved.
7. The current deadline to complete mediation is October 29, 2018. Accordingly, the parties now need an extension of the mediation deadline.

Respectfully submitted,

GORDON & REES

Dated: November 29, 2018

SCULLY MANSUKHANI LLP

By: /s/ Marie Trimble Holvick
Marie Trimble Holvick
Ronnie Shou
Attorneys for Defendants
VASONA MANAGEMENT, INC. and
CATALINA CREST, LLC

1 Dated: November 27, 2018

AllAccess Law Group

2 By: /s/ Irakli Karbelashvili

3 Irene Karbelashvili

4 Irakli Karbelashvili

5 Attorneys for Plaintiffs

D.W. and SHAMON BLUE

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7 **DECLARATION IN SUPPORT OF STIPULATION**

8 I, Irakli Karbelashvili, hereby declare as follows:

9 1. I am an attorney licensed to practice law in the State of California and I am admitted to
10 practice before this Court. I am counsel of record for Plaintiffs. I submit this declaration pursuant
11 to Local Rule 6-2 in support of the parties' stipulation to continue the mediation deadline.

12 2. Pursuant to Local Rule 6-2, I attest that the facts set forth in the stipulation are all true
13 and accurate. The relief requested in this stipulation is necessary because the parties were unable
14 to meet the October 29, 2018 mediation deadline. Mediation is currently scheduled for January 3,
2019.

15 3. This is the parties' second request for a time modification. (Dkt. 15).

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17 I declare under penalty of perjury under the laws of the United States of America that
18 the foregoing is true and correct. Executed in San Jose, California on November 27, 2018.

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20 /s/ Irakli Karbelashvili

21 Irakli Karbelashvili

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[PROPOSED] ORDER

Having reviewed the above stipulation, and good cause having been shown, the deadline to hold a mediation session under General Order 56 is continued to January 3, 201