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 15 US FOODS, INC.

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 17 UNITED STATES DISTRICT COURT
 18 NORTHERN DISTRICT OF CALIFORNIA

19 ERIC CRANFORD,
 20 Plaintiff,
 21 v.
 22 U.S. FOODS, INC. dba U.S. FOODSERVICE,
 23 INC., a California Corporation; and DOES 1
 through 50,
 24 Defendants.

Case No. 3:18-cv-00301-JST

**JOINT STIPULATION TO CONTINUE
 MEDIATION DEADLINE AND
~~PROPOSED~~ ORDER**

[Assigned to The Honorable Jon S. Tigar,
 Courtroom 9 – 19th Floor]

Complaint Filed: November 27, 2017
 Trial Date: September 30, 2019

1 Plaintiff Eric Cranford (“Plaintiff”) and Defendant US Foods, Inc. (“Defendant”) (collectively
2 “the Parties”), by and through their counsel, and pursuant to ADR L.R. 6-5 and L.R. 7-12, hereby
3 stipulate and jointly request that the Court continue the deadline to complete the mediation in this
4 matter, currently set for October 28, 2018. The basis for the Parties’ request is as follows:

5 1. On March 29, 2018, the Court granted the Parties’ stipulation and request for a referral to
6 the Northern District of California’s mediation program. (Dkt. No. 15.) The Court set the deadline for
7 completing the mediation as October 28, 2018. (Id.)

8 2. On August 22, 2018, the Court appointed Katherine Clark as mediator. (Dkt. No. 24.)

9 3. In August of 2018, Defendant’s lead counsel, Candice Zee, left Seyfarth Shaw.
10 Defendant has selected a new lead counsel, Michael A. Wahlander. However, due to Mr. Wahlander’s
11 need to familiarize himself with the case, the Parties have postponed Plaintiff’s deposition. Due to
12 scheduling conflicts, the Parties cannot reschedule it until November 2018, at the earliest. To ensure the
13 mediation is productive, Defendant would like to complete Plaintiff’s deposition before commencing the
14 mediation.

15 4. These developments prohibit the Parties from rescheduling the mediation by October 28,
16 2018, the current mediation deadline.

17 5. The Parties have not previously requested a continuance of any deadlines in this case.

18 6. Given that trial is not set to occur until September 2019, the continuance of the mediation
19 date for this short period will not unduly delay the resolution of this matter. Continuing the mediation
20 date will also not impact any of the other deadlines currently set in this matter.

21 THEREFORE, the Parties STIPULATE and request as follows:

22 1. That the Court extend the mediation deadline to December 28, 2018.

23 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD
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DATED: August 28, 2018

CRABTREE SCHMIDT

By: /s/ Michael R. Dennis
Michael R. Dennis

DATED: August 28, 2018

SEYFARTH SHAW LLP

By: /s/ Monica Rodriguez
Michael A. Wahlander
Monica Rodriguez

Attorneys for Defendant
US FOODS, INC.

I hereby attest that all signatories indicated by a conformed signature (/s/) have concurred in the filing of this document.

/s/ Monica Rodriguez

Monica Rodriguez

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

1. The mediation deadline ⁱⁿ ~~is~~ this Action is reset to be completed by December 28, 2018.

DATED: August 29, 2018



JUDGE JON S. TIGARD