1 BRIAN A. DUUS, ESQ. (SBN 263403) CLARIZA C. GARCIA, ESQ. (SBN 189918) **LEONE ALBERTS & DUUS** 3 A Professional Corporation 1390 Willow Pass Road, Suite 700 Concord. CA 94520-7913 Telephone: (925) 974-8600 5 Facsimile: (925) 974-8601 6 Emails:bduus@leonealberts.com 7 cgarcia@leonealberts.com 8 Attorneys for Defendants MOUNT DIABLO UNIFIED SCHOOL DISTRICT 10 UNITED STATES DISTRICT COURT 11 NORTHERN DISTRICT OF CALIFORNIA 12 BRET BAILEY, Case No.: 3:24-CV-00188-AGT 13 Plaintiff. 14 STIPULATION TO EXTEND TIME TO 15 COMPLETE ADR \: ORDER VS. 16 MOUNT DIABLO UNIFIED SCHOOL 17 DISTRICT, Complaint Filed: January 10, 2024 Trial Date: TBD 18 Defendants. 19 IT IS HEREBY STIPULATED by and between the parties, Plaintiff BRET 20 BAILEY ("Plaintiff") and Defendant MOUNT DIABLO UNIFIED SCHOOL 21 DISTRICT (the "District") (collectively, the "Parties"), as follows: 22 The parties met with Magistrate Judge Lisa J. Cisneros for a Pre-23 Settlement Conference to discuss dates for a settlement conference on 24 November 14, 2024. The parties are unavailable for a settlement conference in 25 December 2025, and they seek to engage in limited discovery for purposes of 26 preparing their case for the upcoming settlement conference. At the moment, the 27

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deadline for ADR in this case is January 5, 2025.

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The Court is available to conduct a settlement conference date on January 17 and 31, 2025, and the parties are seeking an extension of time for the ADR deadline until February 5, 2025 to be able to conduct the settlement conference.

Pursuant to local rules, this document is being electronically filed through the Court's ECF System. In this regard, counsel for the District hereby attests that (1) the content of this document is acceptable to all persons required to sign the document; (2) Plaintiff's counsel has concurred with the filing of this document; and (3) a record supporting this concurrence is available for inspection or production if so ordered.

IT IS SO STIPULATED.

Dated: November 22, 2024 **EISENBERG & BAUM, LLP** 

> /s/ Andrew Rozynski Attorney for Plaintiff **BRET BAILEY**

Dated: November 22, 2024

**LEONE ALBERTS & DUUS, APC** 

s/ Clariza C. Garcia CLARIZA C. GARCIA Attorney for Defendants MOUNT DIABLO UNIFIED SCHOOL DISTRICT

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Date: November 25, 2024

