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10 Attorneys for Plaintiffs

11
 12 UNITED STATES DISTRICT COURT
 13 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 14

15 MARIA COZZI; MARTHA GRIGSBY;
 16 BEVERLY HODGES; YUN BIN HSU; JOAN G.
 MONTEVERDI; MARYBETH PASCALE;
 17 MONICA H. PATENAUDE; MARGARET A.
 18 TURNER; and THOMAS R. WATSON;

19 Plaintiffs,

20 v.

21 COUNTY OF MARIN; MARIANO ZAMUDIO;
 22 GRETCHEN MELENDY; and DOES 1 through
 50,

23 Defendants.
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 25

Case No.: USDC 08 3633 PJH

STIPULATION AND [~~PROPOSED~~] ORDER
 EXTENDING ADR/ENE DEADLINE

26 IT IS HEREBY STIPULATED by and between the parties to extend the presently set
 27 ADR/ENE deadline of April 20, 2009 for a period of thirty (30) days.

28 There is good cause for the stipulation to extend time as follows:

1 There is good cause for the stipulation to extend time as follows:

2 The primary purpose of this request is the recent and unexpected unavailability of lead trial
3 counsel for the plaintiffs. In particular, plaintiff's lead trial counsel, David M. Poore, has been out of
4 state taking depositions in another matter venued in New Jersey, *Opperman v. Allstate New Jersey*
5 *Insurance Company*, et al., U.S. District Court, District of New Jersey Action No 07-1887 (RMB), and
6 is now required to complete a Rule 30(b)(6) deposition of a third-party corporate entity in Los Angeles,
7 California, on April 7 and 8, 2009. Plaintiff's counsel is unable to reschedule this deposition as the
8 parties are required to complete all class discovery no later than April 16, 2009. Given these conflicts,
9 it would be impossible for plaintiffs' lead counsel to participate in the ENE currently scheduled for
10 April 8, 2009. The parties stipulate and agree that this conflict constitutes good cause to continue this
11 matter, however none of the parties, their counsel, or the ENE evaluator can be available until after the
12 current ENE deadline of April 20, 2009. The parties anticipate on completing the ENE session by May
13 22, 2009. Accordingly, there is good cause for this request and no parties will suffer any prejudice.

14 The parties are not making this request for any improper purpose, including undue delay.
15 Instead, the parties agree that judicial economy will be served if this request is granted. In particular,
16 allowing additional time will provide the parties to adequately participate in the ENE with lead trial
17 counsel. Moreover, as noted above, neither party would suffer any prejudice as the parties have
18 stipulated to this request.

19 SO STIPULATED.

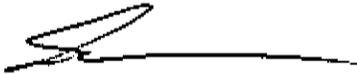
20 Dated: April 6, 2009

PATRICK K. FAULKNER
COUNTY COUNSEL

21
22
23 By: 
24 Stephen R. Raab
Attorney for Defendants

25 Dated: April 6, 2009

KAHN BROWN & POORE LLP

26
27 By: 
28 David M. Poore
Attorney for Plaintiff

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PROPOSED ORDER

THE COURT HEREBY ORDERS AS FOLLOWS:

The parties' request to extend the ADR/ENE is GRANTED. The presently scheduled ADR/ENE deadline of April 20, 2009 is hereby extended to May 30, 2009.

SO ORDERED

DATED: 4/20/09

