

1 JOHN L. BURRIS, Esq./ State Bar # 69888
 LAW OFFICES OF JOHN L. BURRIS
 2 7677 Oakport Street, Suite 1120
 Oakland, CA 94621
 3 Telephone: (510) 839-5200
 Facsimile: (510) 839-3882
 4

5 GAYLA B. LIBET, Esq./ State Bar # 109173
 LAW OFFICES OF GAYLA B. LIBET
 6 486 41st Street, Suite 3
 Oakland, CA 94609
 7 Telephone and Facsimile: (510) 420-0324

8 **Attorneys for Plaintiff JAMES WHITE**

9 DENNIS J. HERRERA/ State Bar # 139669
 City Attorney
 10 JOANNE HOEPER/ State Bar # 114961
 Chief Trial Deputy
 11 CELIA W. LEE/ State Bar # 172981
 Deputy City Attorney
 12 Office of San Francisco City Attorney
 13 1390 Market Street, Sixth Floor
 San Francisco, CA 94102-5408
 14 Telephone: (415) 554-3858
 15 Facsimile: (415) 554-3837

16 Attorneys for Defendants
 CITY AND COUNTY OF SAN FRANCISCO;
 17 HEATHER FONG; DERRICK J. LEW;
 18 DAVID CORREA; and AJAY SINGH

19 UNITED STATES DISTRICT COURT
 20 FOR THE NORTHERN DISTRICT OF CALIFORNIA

21
 22 JAMES B. WHITE,
 23 Plaintiff,
 24 vs.
 25 CITY AND COUNTY OF SAN FRANCISCO,
 26 a municipal corporation; et al.
 27 Defendants.
 28

Case No. C 08-05419 PJH

**STIPULATION AND (~~PROPOSED~~) ORDER
 TO EXTEND TIME FOR COMPLETION
 OF MEDIATION AND TO CONTINUE
 DATE OF CASE MANAGEMENT
 CONFERENCE**

1 **STIPULATION**

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3 ALL PARTIES TO THIS ACTION STIPULATE AND AGREE, BY AND THROUGH THEIR
4 RESPECTIVE COUNSEL, AS FOLLOWS:

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6 1. Defense counsel was ill for an extended time, and then was tied up with extensive work to be
7 done in many cases. Thus, defense counsel has served written discovery by mail on plaintiff's
8 counsel on December 30, 2009. Plaintiff's counsel is in the process of meeting and conferring with
9 defense counsel regarding discovery issues, namely: Defendants' responses to written discovery
10 which plaintiff finds inadequate and incomplete. Plaintiff's counsel will write a letter detailing what
11 is requested to be produced and responded to, and the relevant case law. Further, defense counsel has
12 drafted a Stipulated Protective Order which all counsel are finalizing so that it may be E-filed shortly,
13 and aid in the discovery process. Counsel have not yet conducted key depositions in this case.
14 Therefore, the above-referenced discovery and discovery issues need to be addressed and completed
15 before any meaningful mediation can occur.

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17 2. The Mediator in this matter, Christopher Johns, Esq., has engaged in a telephone conference with
18 counsel, and we all have agreed to the need to request an extension of time for completion of
19 mediation, and agreed to a new date for the Mediation: March 1, 2010, at 9:00 a.m. Therefore, it
20 would be advantageous to re-schedule the next Case Management Conference from the presently
21 scheduled date of January 7, 2010 to a date in March 2010, following the completion of the
22 Mediation; and,

23
24 3. Therefore, good cause appearing, and counsel and Mediator have conferred and agreed, the
25 parties request that this Court continue the Case Management Conference presently scheduled for
26 Thursday, January 7, 2010 at 2:30 p.m. to a ^{March 25, 2010 at 2:00 p.m.} ~~Thursday in mid or late March 2010 at 2:30 p.m.~~, and to
27 extend time for completion of Mediation from December 31, 2009 to March 1, 2010.

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Respectfully submitted,

LAW OFFICES OF GAYLA B. LIBET

Dated: December 30, 2009

By: /S/
GAYLA B. LIBET, Esq.
Attorneys for Plaintiff

LAW OFFICES OF JOHN L. BURRIS

Dated: December 30, 2009

By: /S/
JOHN L. BURRIS, Esq.
Attorneys for Plaintiff

DENNIS J. HERRERA, City Attorney
JOANNE HOEPER, Chief Trial Deputy
CELIA W. LEE, Deputy City Attorney

Dated: December 30, 2009

By: /S/
CELIA W. LEE, Esq.
Attorneys for Defendants

1 **ATTORNEY ATTESTATION**

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3 I hereby attest that I have on file all holograph signatures for any signatures indicated
4
5 by a conformed signature, indicated as “/s/ ” within this E-filed document.
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7
8 Dated: December 30, 2009

By: /S/
GAYLA B. LIBET, Esq.

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15 **ORDER**

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17 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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21 Dated: 1/4/10

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23 HONORABLE  HAMILTON
United States District Court Judge
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