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 6 COLLEGE OF THE REDWOODS

7 UNITED STATE DISTRICT COURT
 8 NORTHERN DISTRICT

9 RUBY SODHI,
 10 Plaintiff,
 11 vs.
 12 COLLEGE OF THE REDWOODS AND
 MELISSA GREEN,
 13 Defendant.
 14

) Case No.: CV-09-1970 PJH
)
) **STIPULATION FOR EXTENSION OF**
) **TIME TO COMPLETE MEDIATION**

15
 16 **IT IS HEREBY STIPULATED** by and between plaintiff RUBY SODHI and defendants
 17 COLLEGE OF THE REDWOODS and MELISSA GREEN, through their respective undersigned
 18 counsel, that the mediation compliance date in this matter be continued from February 17, 2010 to
 19 June 18, 2010.

20 Good cause exists to continue the mediation compliance date as follows:

21 On September 15, 2009, the parties appeared for a case management conference and were
 22 referred to mediation. The parties were given a mediation compliance date of February 17, 2010, and
 23 ultimately assigned to mediator Michel Bien of Rosen, Bien & Galvan for mediation. Mediation is
 24 presently scheduled for February 17, 2010.

25 The parties now seek a continuance of the mediation compliance date to permit additional
 26 time to complete discovery necessary for mediation and to accommodate the surgery of defense
 27 counsel. Initial written discovery has been exchanged by the parties, but plaintiff's deposition
 28 remains to be taken. Defendants anticipate that deposition will take multiple days due to the

1 voluminous documents at issue and number of witnesses identified by plaintiff in discovery.
2 Plaintiff's counsel is scheduled to begin a lengthy class action trial on January 25, 2010, which will
3 further prevent the parties from completing necessary pre-mediation discovery by February 17, 2010.

4 In addition, defense counsel is scheduled for hip surgery on February 10, 2010, a week before
5 the mediation, and anticipates being out of the office for a minimum of one to two weeks.

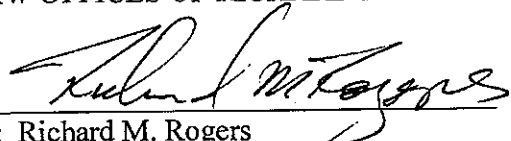
6 No prejudice will result to the parties and no disruption will occur to any scheduling order
7 should the mediation compliance date be moved as requested. Trial in this matter is set for February
8 14, 2011, and the discovery cutoff is set for July 28, 2010.

9 It is therefore respectfully requested that the mediation compliance date be continued from
10 February 17, 2010 to June 18, 2010.

11 The parties stipulate that a copy of a signature transmitted by any electronic means including,
12 but not limited to, facsimile machine and scanned document transmitted via e-mail will have the same
13 force and effect as an original signature.

14
15 Dated: January 13, 2010

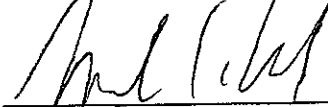
16 LAW OFFICES OF RICHARD M. ROGERS

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18
19 by: Richard M. Rogers
20 Attorney for Plaintiff RUBY SODHI

Dated: January 13, 2010

BERTRAND, FOX & ELLIOT



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by: Michael C. Wenzel,
Attorney for Defendants COLLEGE OF
THE REDWOODS

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ORDER

GOOD CAUSE APPEARING THEREFORE, the stipulation to continue the mediation compliance date in this matter from February 17, 2010 to June 18, 2010 is GRANTED.

IT IS SO ORDERED.

DATED: 1/26/10

