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Eugene B. Elliot, SBN 111475 Michael C. Wenzel, SBN 215388 BERTRAND, FOX & ELLIOT The Waterfront Building 3 2749 Hyde Street San Francisco, California 94109 4 Telephone: (415) 353-0999 (415) 353-0990 Facsimile: 5 Attorneys for Defendant 6 COLLEGE OF THE REDWOODS 7 UNITED STATE DISTRICT COURT 8 NORTHERN DISTRICT 9 RUBY SODHI, Case No.: CV-09-1970 PJH 10 Plaintiff. STIPULATION FOR EXTENSION OF 11 TIME TO COMPLETE MEDIATION vs. 12 COLLEGE OF THE REDWOODS AND MELISSA GREEN, 13 Defendant. 14 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 June 18, 2010 to July 19 28, 2010. 16 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 ultimately assigned to mediator Michel Bien of Rosen, Bien & Galvan for mediation. Mediation was 23 24 scheduled for February 17, 2010.

The parties sought a continuance of the mediation compliance date to permit additional time

Plaintiff was out of the Country for the entire months of February and March and resides near

to complete discovery necessary for mediation and to accommodate the surgery of defense counsel

on January 13, 2010. That request was granted on January 26, 2010.

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Eureka California. Defendants scheduled plaintiff's deposition almost immediately after her return for April 7, 2010 and, if necessary, April 8, 2010, in San Francisco. The deposition was not completed on April 7, 2010. Unfortunately defense counsel became ill with the flu on the evening of April 7, 2010 and missed several days of work. Accordingly, the deposition could not be resumed on April 8, 2010.

The parties have met and conferred regarding rescheduling of plaintiff's continued deposition and the first date available to resume that deposition appears to be June 11, 2010. Plaintiff and her counsel have only one date of availability for resumption of the deposition (May 21, 2010) before the currently scheduled mediation date of June 9, 2010 but defense counsel is unavailable on May 21, 2010. Completion of plaintiff's deposition is necessary for defendants to properly evaluate the case and to ensure a meaningful mediation.

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

It is therefore respectfully requested that the mediation compliance date be continued from June 18, 2010 to July  $\frac{28}{11}$ , 2010.

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

Dated: April 21, 2010

LAW OFFICES OF RICHARD M. ROGERS

by: Richard M. Rogers

Attorney for Plaintiff RUBY SODHI

Dated: April 30, 2010

BERTRAND, FOX & ELLIOT

by: Michael C. Wenzel,

Attorney for Defendants COLLEGE OF THE REDWOODS and MELISSA GREEN

## **ORDER**

GOOD CAUSE APPEARING THEREFORE, the stipulation to continue the mediation compliance date in this matter from June 18, 2010 to July 28, 2010 is GRANTED.

IT IS SO ORDERED.

DATED: 5/7/10

