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 9 CITY AND COUNTY OF SAN FRANCISCO

11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA

13 SHANIA RAMAN,  
 14 Plaintiff,  
 15 vs.

Case No. C10-0752PJH

**STIPULATION TO EXTEND ENE DEADLINE  
 AND PROPOSED ORDER**

16 THE CITY AND COUNTY OF SAN  
 17 FRANCISCO, a municipality and political  
 subdivision of the State of California, and  
 18 BRYAN THOMASSON, an individual,  
 19 Defendant(s).

Trial Date: October 24, 2011

21 PLEASE TAKE NOTICE that Defendant City and County of San Francisco ("Defendant")  
 22 respectfully files this request for an extension of the deadline to complete an early neutral evaluation  
 23 ("ENE") in this matter. Defendant, in stipulation with Plaintiff and Defendant Thomasson, request that  
 24 the ENE deadline be continued 120 days to December 28, 2010.

25 A case management conference was held on May 27, 2010. On June 1, 2010 the court issued  
 26 the Case Management and Pretrial Order, referring the case to ADR for ENE to be completed within  
 27 90 days. The 90 days expires on August 30, 2010.  
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1           ENE evaluator, George Harris, was appointed by the ADR clerk on July 19. (See Docket No.  
2 129.) The evaluator contacted the parties on August 3 and scheduled a phone conference for August 6.  
3 On August 6 the phone conference was not able to take place due to unavailability of Plaintiffs'  
4 counsel. The phone conference was subsequently rescheduled to August 13.

5           Given the parties' and evaluator's schedules, the parties are unable to complete ENE prior to  
6 August 30. Moreover, at this point there has been limited discovery in this case. Other than initial  
7 disclosures, the only discovery includes requests for production noticed by Defendant City and several  
8 subpoenas for records noticed by Defendant Thomasson. A response to either is yet to be received.  
9 The parties believe additional discovery is necessary to make the ENE a productive process. In  
10 addition, Defendant City's counsel is unavailable and out of the country the first three weeks of  
11 October, the ENE evaluator is unavailable the last week of October and first three weeks of November  
12 due to an arbitration in Singapore, and Defendant City's counsel is scheduled for a two week trial  
13 November 29.

14           For the above reasons, Defendant City, Defendant Thomasson and Plaintiff request a 120 day  
15 extension of the ENE deadline to December 28, 2010. All parties are in agreement with this request  
16 and their stipulation is below:

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