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6 Attorneys for Defendants
 CLAY COLLINS AND TODD COLLINS

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

11 NICOLE STRAWN)

12 Plaintiff,)

13 v.)

14 SHENANDOAH CHARTERS, CLAY)
 COLLINS, TODD J. COLLINS, and DOES)
 15 1-10, *in personam*, and FV)
 SHENANDOAH, and her engines, tackle,)
 16 apparel, etc., *in rem*,)

17 Defendants.)

Case No. CV-10-4015 PJH

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND MEDIATION AND
 DISCOVERY DEADLINES**

Complaint filed: September 8, 2010
 Trial Date: May 21, 2012

19 Defendants CLAY COLLINS and TODD COLLINS, by and through their counsel of
 20 record, Gibson Robb & Lindh LLP, and Plaintiff NICOLE STRAWN, by and through her
 21 counsel of record, Brodsky Micklow Bull & Weiss LLP, hereby enter into the below stipulation
 22 to continue the mediation and discovery deadlines in this matter.

23 This stipulation is made in consideration of the fact that the parties have been actively
 24 engaged in discovery including extensive written discovery, but need additional time to complete
 25 depositions. Counsel for both parties are working together to coordinate the depositions of
 26 Plaintiff and Defendants, which will likely require travel to Eureka and Redding, California.
 27 Until these depositions are complete, the parties will not have the foundational information

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1 necessary to fully evaluate the case for mediation. The parties have agreed to mediate the case
2 with Chris Lavdiotis on January 12, 2012.

3 Based on the foregoing, the parties submit that there is good cause to continue the
4 mediation completion deadline and all discovery dates by at least 90 days. This would move the
5 mediation completion date from October 18, 2011, to mid-January 2012. This would move the
6 non-expert discovery cutoff from November 18, 2011, to mid-February 2012. This would move
7 the date to disclose experts (retained and non-retained) from November 18, 2011, to mid-
8 February 2012. This would move the expert discovery cutoff deadline of January 11, 2012, to
9 early April 2012. This would not affect the trial date of May 21, 2012. The parties hereby
10 stipulate that the Court's Case Management and Pretrial Order may be amended as set forth
11 below.

12
13 Dated: November 2, 2011

BRODSKY MICKLOW BULL & WEISS LLP

14
15 By: S/ EDWARD M. BULL, III

Edward M. Bull, III
Amy Jo Bull, Esq.
Attorneys for Plaintiff
NICOLE STRAWN

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19 Dated: November 2, 2011

GIBSON ROBB & LINDH LLP

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21 By: S/ MARKER E. LOVELL, JR.

Marker E. Lovell, Jr.
Attorneys for Defendants
CLAY COLLINS AND TODD COLLINS

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24 **CERTIFICATE OF SIGNATURE**

25 I attest that the content of this document is acceptable to attorney, Edward M. Bull III, and that he
26 authorized me to sign the document on his behalf.

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ORDER

IT IS SO ORDERED.

Based on the foregoing stipulation, the mediation completion date of October 18, 2011, is off calendar. The new mediation completion date is January 20, 2012.

The non-expert discovery cutoff date of November 18, 2011, is off calendar. The new non-expert discovery cutoff date is February 17, 2012.

The date to disclose experts (retained and non-retained) of November 18, 2011, is off calendar. The new date to disclose experts (retained and non-retained) is February 17, 2012.

The expert discovery cutoff deadline of January 11, 2012, is now off calendar. The new expert discovery cutoff deadline is April 6, 2012.

All other dates in the Court’s Case Management and Pretrial Order dated May 2, 2011, remain unchanged.

Dated: November 4, 2011



1 **PROOF OF SERVICE BY MAIL**

2 STATE OF CALIFORNIA, CITY AND COUNTY OF SAN FRANCISCO

3 I am employed in the City and County of San Francisco by the law firm of GIBSON
4 ROBB & LINDH LLP, 201 Mission Street, Suite 2700, San Francisco, California 94105. I am
5 over the age of 18 years and not a party to the within action. I am readily familiar with the
6 practice of GIBSON ROBB & LINDH LLP with respect to the collection and processing of
7 pleadings, discovery documents, motions and all other documents which must be served upon
8 opposing parties or other counsel in litigation. The below-described document(s) will be
9 deposited in the ordinary course of the business of GIBSON ROBB & LINDH LLP with the
10 United States Postal Service on the same date as I sign this document. On November 2, 2011, I
11 served the within **STIPULATION AND [PROPOSED] ORDER TO EXTEND MEDIATION**
12 **AND DISCOVERY DEADLINES DEFENDANTS CLAY COLLINS AND TODD**
13 **COLLINS TO PLAINTIFF'S COMPLAINT** in said action by placing a true copy thereof
14 enclosed in a sealed envelope with first class postage thereon fully prepaid addressed as follows:
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17

18 Amy Jo Bull, Esq.
19 BRODSKY MICKLOW BULL & WEISS
20 LLP
21 384 Embarcadero West, Suite 200
22 Oakland, CA 94607

23 *Attorneys for Plaintiff*
24 **NICOLE STRAWN**

25 Following the ordinary business practices of GIBSON ROBB & LINDH LLP, I placed
26 the aforesaid envelope in the place for collection and mailing on the date specified.

27 Pursuant to the Local Rules of the United States District Court, I certify that all originals
28 and service copies (including exhibits) of the papers referred to herein were produced and

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1 reproduced on paper purchased as recycled, as defined by Section 42202 of the Public Resources
2 Code.

3 I declare under penalty of perjury under the laws of the Unites States of America that the
4 foregoing is true and correct.
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6 Executed on November 2, 2011, at San Francisco, California.

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9 T. Lianne Jitodai

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