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6 Attorneys for Plaintiff
 7 CAROLYN MARTIN

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

10 CAROLYN MARTIN
 11 Plaintiff,

CASE NO. C 11-01620 LB
Civil Rights

12 V.

13 DOMINIC’S ORIGINAL GENOVA
 14 DELICATESSEN, INC;
 15 TEMESCAL PLAZA, LLC;
 16 and DOES 1-25, Inclusive,
 17 Defendants.

**STIPULATION AND ~~PROPOSED~~
 ORDER FOR ENLARGEMENT
 OF TIME TO AUGUST 11, 2011
 TO CONDUCT GENERAL
 ORDER 56 “MEET AND CONFER”**

(Local Rule 6-2)

_____ /

1 **STIPULATION**

2 Plaintiff CAROLYN MARTIN, by and through her attorney, and
3 Defendant TEMESCAL PLAZA, LLC, by and through its attorney, stipulate to
4 an enlargement of time from July 19, 2011 to August 11,2011 to conduct the
5 “meet and confer” between them required by paragraph 4 of General Order 56
6 and, for the reasons stated in the declaration of Sidney J. Cohen set forth below,
7 request that the Court order an enlargement to the requested August 11, 2011
8 date.

9 Date: July 12, 2011

SIDNEY J. COHEN
PROFESSIONAL CORPORATION

10 /s/ Sidney J. Cohen

11 _____
12 SIDNEY J. COHEN
Attorney for Plaintiff Carolyn Martin

13 Date: July 12, 2011

JACKSON & LEWIS LLP

14 /s/ Dylan B. Carp

15 _____
16 Dylan B. Carp
Attorneys for Defendant Temescal Plaza,
17 LLC

18 **DECLARATION OF SIDNEY J. COHEN**

19 I, Sidney J. Cohen, declare as follows:

20 1. I am counsel for Plaintiff Carolyn Martin in this action. I am an
21 attorney in good standing and licensed to practice in the courts of California, in
22 the United States District Courts for the Northern, Eastern, and Central Districts,
23 in the United States Court of Appeals for the Ninth Circuit, and in the United
24 States Supreme Court. If called upon to testify, I would testify as follows:

25 2. The joint site inspection required by paragraph 4 of General Order
26 56 took place on July 5, 2011. Plaintiff’s consultant committed to complete a
27 Report by on or about July 13, 2011, which Report will contain each and every
28 barrier to access that Plaintiff contends exists at the property and premises which

1 are the subject of this action and the remedial work for each that Plaintiff
2 contends is required to bring each into compliance with applicable federal and
3 state disabled access statutes and implementing regulations. Plaintiff also
4 committed to providing a copy of the Report to Defendant Temescal Plaza, LLC.

5 3. I will be out of state and unavailable for a “meet and confer” during
6 the period July 14, 2011-July 24, 2011.

7 4. Because of the time required for the preparation of the Report by
8 Plaintiff’s consultant, the time required for review of the Report by Defendant
9 Temescal Plaza, LLC and its counsel, and scheduling issues and travel conflicts,
10 Plaintiff and Defendant Temescal Plaza, LLC will not be able to conduct their
11 “meet and confer” within ten (10) business days of the joint site inspection as set
12 forth in General Order 56.

13 5. For the reasons stated above, Plaintiff and Defendant Temescal
14 Plaza, LLC are by this Stipulation requesting that the Court extend the meet
15 and confer deadline from July 19, 2011 to August 11, 2011.

16 6. Thus far there have been no modification made to the deadlines
17 imposed by statute, rule of court, or by the Court in this Action.

18 7. If granted, the extension of the deadline to August 11, 2011 to hold
19 the “meet and confer” will not affect any other time lines or deadlines established
20 by statute, rule of court, or the Court in this Action.

21 I declare under penalty of perjury under the laws of the State of California
22 that the foregoing is true and correct.

23 Executed on July 12, 2011 in the City of Oakland, California.

24 /s/ Sidney J. Cohen
25 Sidney J. Cohen

26 **ORDER ENLARGING TIME TO CONDUCT MEET AND CONFER**

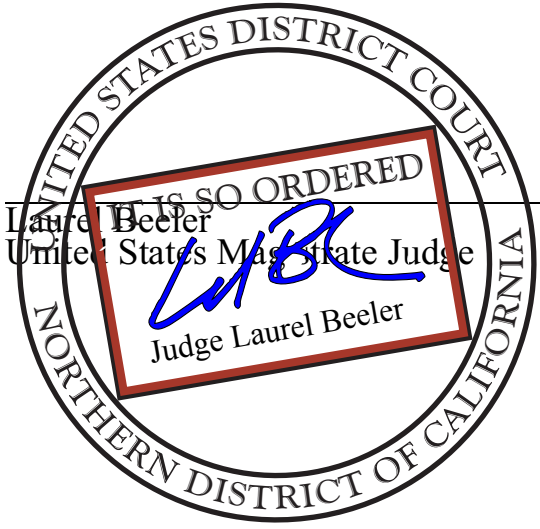
27 1. Upon the stipulated request made by the Plaintiff Carolyn Martin and
28 Defendant Temescal Plaza, LLC in this Action, the Court finds good cause to

1 enlarge the deadline for them to hold their “meet and confer” from July 19,
2 2011 to August 11, 2011.

3 2. The Court orders that the date by which Plaintiff Carolyn Martin and
4 Defendant Temescal Plaza, LLC are to conduct the “meet and confer” is
5 enlarged to August 11, 2011.

6 IT IS SO ORDERED.

7 Date: July 21, 2011



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