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Mark S. Askanas (State Bar No. 122745)
Dylan B. Carp (State Bar No. 196846)
JACKSON LEWIS LLP
199 Fremont Street, 10th Floor
San Francisco, California 94105
Telephone: (415) 394-9400
Facsimile: (415) 394-9401
askanasm@jacksonlewis.com
carpd@jacksonlewis.com

Attorneys for Defendants
TEMESCAL PLAZA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CAROLYN MARTIN,

Plaintiff,

v.

DOMINIC'S ORIGINAL GENOVA
DELICATESSEN, INC.; TEMESCAL PLAZA,
LLC; and Does 1-10, Inclusive,

Defendants.

Case No. C11-01620 LB ADR

**STIPULATION AND ~~PROPOSED~~
ORDER FOR ENLARGEMENT OF
TIME TO SEPTEMBER 8, 2011 TO
CONDUCT GENERAL ORDER 56
MEET AND CONFER**

Complaint Filed: April 1, 2011
Trial Date: None Set

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STIPULATION

Whereas Plaintiff and Defendant Temescal Plaza, LLC need additional time to hold their in person meet and confer regarding settlement as required by General Order 56, ¶ 4;

IT IS HEREBY STIPULATED that the date by which Plaintiff and Defendant Temescal Plaza, LLC are to conduct the meet and confer is enlarged to September 8, 2011, and that the deadline by which Plaintiff must file any Notice of Need for Mediation is extended until September 19, 2011.

Dated: July 29, 2011

SIDNEY J. COHEN
PROFESSIONAL CORPORATION

By: /s/ Sidney J. Cohen
Sidney J. Cohen, Esq.
Attorney for Plaintiff
CAROLYN MARTIN

Dated: July 29, 2011

JACKSON LEWIS LLP

By: [Signature]
Mark S. Askanas
Dylan B. Carp
Attorneys for Defendant
TEMESCAL PLAZA, LLC

DECLARATION OF DYLAN B. CARP

I, Dylan B. Carp, hereby declare as follows:

1. I have personal knowledge of the following facts and, if called as a witness, I could and would testify competently to them.
2. I am an attorney with Jackson Lewis LLP, counsel for Defendant Temescal Plaza, LLC.
3. Plaintiff and Defendant Temescal Plaza, LLC need additional time to hold their in person meet and confer regarding settlement as required by General Order 56, ¶ 4, because I need additional time to consult with Defendant's expert, who is on vacation.
4. Plaintiff and Defendant are requesting that the Court extend the meet and confer deadline from August 11 to September 8, 2011.

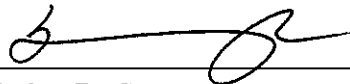
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5. The Court has previously granted one extension from July 19 to August 11, 2011.

6. If granted, the extension may affect the current August 19, 2011 deadline for Plaintiff to file a Notice of Need for Mediation. Therefore, the parties request the Court extend that deadline until September 19, 2011

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

Dated: July 29, 2011.



Dylan B. Carp

ORDER ENLARGING TIME TO CONDUCT MEET AND CONFER

1. Upon the stipulated request made by Plaintiff and Defendant Temescal Plaza, LLC, the Court finds good cause to enlarge the deadline for them to hold their meet and confer from August 11, 2011 until September 8, 2011, and to enlarge the deadline for Plaintiff to file any Notice of Need for Mediation from August 19, 2011 to September 19, 2011.

2. The Court orders that the deadline for Plaintiff and Defendant Temescal Plaza, LLC to hold their meet and confer is continued from August 11, 2011 until September 8, 2011, and that the deadline for Plaintiff to file any Notice of Need for Mediation is continued from August 19, 2011 to September 19, 2011.

Dated: August __, 2011

United States District Court Judge

4811-1931-7514, v. 2