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 TEMESCAL PLAZA, LLC  
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8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
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11 CAROLYN MARTIN,  
 12 Plaintiff,  
 13 v.  
 14 DOMINIC'S ORIGINAL GENOVA  
 DELICATESSEN, INC.; TEMESCAL PLAZA,  
 15 LLC; and Does 1-10, Inclusive,  
 16 Defendants.  
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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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1 **STIPULATION**

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

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

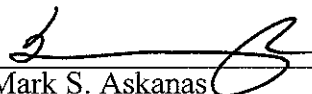
8 Dated: July 29, 2011

SIDNEY J. COHEN  
PROFESSIONAL CORPORATION

9  
10 By: /s/ Sidney J. Cohen  
Sidney J. Cohen, Esq.  
11 Attorney for Plaintiff  
CAROLYN MARTIN

12  
13 Dated: July 29, 2011

JACKSON LEWIS LLP

14 By:   
15 Mark S. Askanas  
Dylan B. Carp  
16 Attorneys for Defendant  
TEMESCAL PLAZA, LLC

17 **DECLARATION OF DYLAN B. CARP**

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

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