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THE UNITED STATES DISTRICT COURT FOR THE

NORTHERN DISTRICT OF CALIFORNIA - OAKLAND DIVISION

Saber Abuzahra, Plaintiff, vs. The United States of America; U.S. Department of Homeland Security; U.S Immigration and Customs Enforcement; U.S. Immigration and Customs Enforcement Officers 1-15; G4S Secure Solutions (USA) Inc.; John Doe, Defendants.	Case No.: C 13 0513-KAW **STIPULATION AND ~~PROPOSED~~ ORDER TO CONTINUE THE INITIAL CASE MANAGEMENT CONFERENCE HEARING**

The parties of this litigation, by and through their respective attorneys of record, hereby submit this stipulation and [proposed] order to continue the Initial Case Management Conference hearing, which is currently scheduled to be held on May 7, 2013 at 1:30 p.m., in Department 4, of the United States District Court - Northern District of California, The Honorable Kandis A. Westmore, judge presiding.

WHEREAS this case arises out of a claim that Plaintiff was injured while in custody, being transported by contractor of INS which, therefore, involved the need to contact multiple parties and obtain records from various government facilities in order to assess the case for settlement;

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WHEREAS both sides have moved efficiently with purpose to acquire the initial basic information needed to evaluate and commence settlement negotiations;

WHEREAS the parties are engaged in an extremely productive, very promising settlement negotiations which, if successful, will result in a global resolution;.

WHEREAS with the Initial Case Management Conference scheduled for May 7, 2013, and an April 30, 2013 deadline to submit Rule 26 Disclosures, that the parties and counsel agree that the time, effort and expense needed to comply on the current tract will impede the ongoing settlement negotiations and result in Defendants being forced to incur fees and costs that might otherwise more productively be allocated toward continuing settlement negotiations.

Accordingly, based on the foregoing good cause shown, the parties to this matter, by and through their respective attorneys of record, hereby stipulate and jointly and respectfully request that the Initial Case Management Conference hearing, currently scheduled for May 7, 2013, at 1:30 p.m., be continued for two weeks to Tuesday, May 21, 2013 at 1:30 p.m., or to any date thereafter the Court is available.

IT IS SO STIPULATED:

Dated: April 29, 2013

MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP

By: /s/ Michael Smith
Michael L. Smith

Attorneys for Defendant,
G4S Secure Solutions (USA) Inc.

Dated: April 29, 2013

JOHNSON & MCDERMED LLP

By: /s/ Jeremiah Johnson
Jeremiah Johnson

Attorneys for Plaintiff,
Saber Abuzahra

Good cause appearing, the Initial Case Management Conference hearing, currently scheduled for May 7, 2013, at 1:30 p.m., shall be continued to May 21, 2013, at 1:30 p.m. The Initial Case Management Conference Statement shall be filed on or before May 14, 2013.

IS SO ORDERED:

Date: 4/30, 2013

Kandis Westmore

KANDIS A. WESTMORE
UNITED STATES DISTRICT MAGISTRATE JUDGE