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12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 STUART P. TITUS, CAROLINE TITUS,

15 Plaintiffs,

16 v.

17 HUMBOLDT COUNTY FAIR ASSOCIATION,  
18 JEFF FARLEY, CINDY OLSEN, JOHN  
19 BURGER, Does 1 through 10,

20 Defendants.

Case No.: 4:14-cv-01043-SBA

**JOINT STIPULATION AND ORDER RE  
MEDIATION PROCESS, MEDIATION  
COMPLETION DATE AND NEXT CASE  
MANAGEMENT CONFERENCE**

21  
22 1. The parties hereto – plaintiffs Stuart and Caroline Titus and defendants Humboldt  
23 County Fair Association, John Burger, Jeff Farley and Cindy Olsen – join in this Stipulation to  
24 request that the court allow them to move the date for completion of the mediation, and reschedule  
25 the Case Management Conference to allow them to first complete some initial depositions and  
26 mediation.

27 2. Plaintiffs filed this lawsuit on March 6, 2014. A First Amended Complaint was filed  
28 on April 24, 2014. The defendants answered on May 8, 2014.

3. The firm known as Foster Employment Law represented the defendants at that time. There was a Rule 26 Disclosure by both sides. There was also an additional disclosure of documents by both sides. Some interrogatories were also served by both sides.

4. The parties then agreed to mediate the case on or by December 19, 2014. Pursuant to a stipulation of the parties, the court entered an order on September 2, 2014 to set December 19 as the mediation completion date. The court also scheduled a Case Management Conference for January 8, 2015.

5. The firm known as Andrada & Associates substituted into the case for the defendants on or about October 8, 2014. As a practical matter, the substitution meant that the mediation deadline needed to be extended.

6. The court appointed Mr. Robert Edwards to serve as mediator on October 15, 2014.

7. The attorneys have met and conferred among themselves and with Mr. Edwards to select a mediation date in light of all the circumstances. The agreed upon date is March 13, 2015. The parties are continuing to engage in discovery. It is anticipated that the plaintiffs will be deposed in January, 2015.

8. Accordingly, the parties respectfully request that: 1) the court revise the mediation completion date to March 13, 2015; and 2) the court continue the Case Management Conference presently set for January 8, 2015 to a date after March 13. The parties suggest the date of March 26, 2015.

Dated: December 4, 2014

ANDRADA & ASSOCIATES

/s/ J. Randall Andrada

By

J. RANDALL ANDRADA  
Attorneys for Defendants  
HUMBOLDT COUNTY FAIR  
ASSOCIATION, JEFF FARLEY, CINDY  
OLSEN, and JOHN BURGER

Dated: December 4, 2014

/s/ Peter E. Martin

By


PETER E. MARTIN  
Attorneys for Plaintiffs  
STUART TITUS and CAROLINE TITUS

**ORDER**

Having considered the Stipulation of the parties, the Court orders that: (1) the mediation completion date is reset to March 13, 2015; and (2) the Case Management Conference is rescheduled to **March 26, 2015** at **3:00 p.m.** The parties shall meet and confer prior to the conference and shall prepare a joint Case Management Statement which shall be filed no later than seven (7) days prior to the Case Management Conference that complies with the Standing Order for All Judges of the Northern District of California and the Standing Order of this Court. Plaintiffs shall be responsible for filing the statement as well as for arranging the conference call. All parties shall be on line and shall call (510) 879-3550 at the above indicated date and time.

IT IS SO ORDERED.

DATED: December 8, 2014

  
Judge Saundra Brown Armstrong  
United States District Judge