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10 Attorneys for Plaintiffs

11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**

14 **ELIZABEL HERNANDEZ, ELIDA**)
CALDERON, and FAIR HOUSING OF)
 15 **MARIN, a Not-for-Profit Corporation,**)

16 **Plaintiffs,**)

17 **vs.**)

18 **VICTOR JUAN UNTIVEROS and 4TH**)
& ELM, LLC,)

19 **Defendants.**)
 20 _____)

Case No. 15-cv-04523-KAW

JOINT APPLICATION AND
STIPULATION TO EXTEND DEADLINE
TO AMEND UNTIL AFTER
MEDIATION; ~~PROPOSED~~ ORDER

21 Pursuant to Local Rules 6-2 and 7-12, plaintiffs and defendant 4th and Elm LLC, by and
 22 through their counsel of record, hereby apply for and stipulate to a brief extension of the
 23 deadline to amend the pleadings in this case through April 29, 2016. The current deadline is
 24 March 31, 2016, as set forth in the Court’s minute order dated January 12, 2016 (ECF 24). This
 25 is the first request of any party for an extension of time. No other dates or deadlines will be
 26 affected by this brief extension.

27 There is good cause to grant this brief extension of time.

28 **JOINT APPLICATION AND STIPULATION TO EXTEND DEADLINE TO AMEND UNTIL AFTER**
MEDIATION; [PROPOSED] ORDER - Case No. 15-cv-04523-KAW

1 First, it is based on the stipulation of counsel.

2 Second, the parties seek this extension because they are currently preparing for a
3 mediation session through the Court's ADR Department. That mediation is scheduled to take
4 place on April 14, 2016.

5 Third, if the parties are unable to reach a resolution at the mediation, plaintiffs intend to
6 act diligently to amend the complaint to name the new owners of the subject property as
7 defendants in the case. The proposed deadline is 15 days following the mediation.

8 Fourth, this litigation is still in the early stages of discovery, and no other dates or
9 deadlines will be affected by this extension. The Court has not scheduled a trial date. Other than
10 the further CMC, scheduled for April 26, 2016, the only date set by the Court thus far is the last
11 day to amend.

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**JOINT APPLICATION AND STIPULATION TO EXTEND DEADLINE TO AMEND UNTIL AFTER
MEDIATION; [PROPOSED] ORDER - Case No. 15-cv-04523-KAW**

1 For all of the foregoing reasons, the parties request that the court issue the order below
2 granting an extension of time to amend the pleadings through April 29, 2016.

3 So stipulated.

4 *I, Liza Cristol-Deman, hereby attest that all signatories whose names appear below have*
5 *consented to the filing of this document.*

6 Respectfully submitted,

7 BRANCART & BRANCART

8 Dated: March 30, 2016

9 /s/ Liza Cristol-Deman
10 Liza Cristol-Deman
11 Attorney for All Plaintiffs

12 FAIR HOUSING OF MARIN

13 Dated: March 30, 2016

14 /s/ Casey Epp
15 Casey Epp
16 Attorneys for All Plaintiffs

17 STRATMAN, PATTERSON & HUNTER

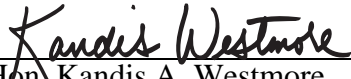
18 Dated: March 30, 2016

19 /s/ P. Richard Colombatto
20 P. Richard Colombatto
21 Attorneys for Defendant 4th & Elm, LLC

22 ~~PROPOSED~~ ORDER

23 PURSUANT TO STIPULATION, IT IS SO ORDERED.

24 Dated: 4/5/16.

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26 
27 Hon. Kandis A. Westmore
28 U.S. Magistrate Judge