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10 Attorneys for Plaintiff
 11 NICOLE MOSS

12 * *Defendants and their counsel listed after the caption.*

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA

15 NICOLE MOSS,
 16 Plaintiff,
 17 v.
 18 SAN FRANCISCO GENERAL
 19 HOSPITAL AND TRAUMA CENTER;
 20 CITY AND COUNTY OF SAN
 21 FRANCISCO DEPARTMENT OF
 PUBLIC HEALTH; CITY AND COUNTY
 OF SAN FRANCISCO; and DOES 1-20,
 INCLUSIVE,
 22 Defendants.

CASE NO. 3:16-cv-00072 KAW
Civil Rights

**STIPULATION AND ~~PROPOSED~~
 ORDER TO EXTEND DEADLINES
 UNDER GENERAL ORDER 56**

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8 Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO
9

10 **STIPULATION**

11 Plaintiff NICOLE MOSS (“Plaintiff”) and Defendant CITY AND COUNTY OF SAN
12 FRANCISCO hereby jointly stipulate and request through their attorneys of record that the deadline
13 to file a Notice of Need for Mediation under General Order 56 be continued to from July 1, 2016, to
14 August 19, 2016. This request for an extension of time is based on the following good cause:

- 15 1. The parties have worked cooperatively to move through General Order 56.
- 16 2. The parties held an initial joint site inspection of the site on June 3, 2016, but due to the
17 presence of patients in the Family Health Center, the parties were unable to complete the
18 site inspection at that time.
- 19 3. The parties completed the site inspection of the Family Health Center on July 7, 2016.
- 20 4. Plaintiff needs some time to prepare a comprehensive request for injunctive relief
21 pursuant to General Order 56.
- 22 5. The parties agree that Plaintiff will make best efforts to provide Defendant with a
23 comprehensive injunctive relief demand by July 28, 2016.
- 24 6. Plaintiff will then allow Defendant 21 days to respond to her demand before filing a
25 Notice for Need of Mediation by August 18, 2016.
- 26 7. The parties therefore jointly stipulate and request that the Court continue the deadline to
27 file a Notice for Need of Mediation to August 19, 2016.
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Date: July 7, 2016

LAW OFFICE OF PAUL L. REIN
RAINS LUCIA STERN, PC

By: /s/ Celia McGuinness
CELIA McGUINNESS, ESQ.
Attorneys for Plaintiff
NICOLE MOSS

Date: July 7, 2016

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MARK D. LIPTON
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By: /s/ Mark D. Lipton
MARK D. LIPTON, ESQ.
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CITY AND COUNTY OF SAN FRANCISCO

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ORDER

Pursuant to the stipulation of the parties, and for good cause shown, IT IS SO ORDERED.
The deadline for Plaintiff to file a Notice for Need of Mediation under General Order 56 is hereby continued to August 19, 2016.

Dated: 7/7, 2016


U.S. Magistrate Judge Kandis A. Westmore