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16 Attorneys for Plaintiff  
 17 NICOLE MOSS

18 \* *Defendants and their counsel listed after the caption.*

19 UNITED STATES DISTRICT COURT  
 20 NORTHERN DISTRICT OF CALIFORNIA

21 NICOLE MOSS,  
 22 Plaintiff,  
 23 v.  
 24 SAN FRANCISCO GENERAL  
 25 HOSPITAL AND TRAUMA CENTER;  
 26 CITY AND COUNTY OF SAN  
 27 FRANCISCO DEPARTMENT OF  
 28 PUBLIC HEALTH; CITY AND COUNTY  
 OF SAN FRANCISCO; and DOES 1-20,  
 INCLUSIVE,  
 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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City Attorney  
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Chief Trial Deputy  
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8 Attorneys for Defendant  
CITY AND COUNTY OF SAN FRANCISCO  
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10 **STIPULATION**

11 Pursuant to the Court's order dated September 21, 2016, Plaintiff NICOLE MOSS  
12 ("Plaintiff") and Defendant CITY AND COUNTY OF SAN FRANCISCO hereby jointly stipulate  
13 and request through their attorneys of record that the deadline to file a Notice of Need for Mediation  
14 under General Order 56 be continued to from August 19, 2016, to December 15, 2016. This  
15 request for an extension of time is based on the following good cause:

- 16 1. The facilities at issue are very large, comprising several buildings;
- 17 2. The report of violations produced by plaintiff's expert is 276-pages long;
- 18 3. The parties need to review voluminous records of the facilities' construction and  
19 alteration history;
- 20 4. The parties would like more time to engage in informal discussions;
- 21 5. The parties therefore jointly stipulate and request that the Court continue the deadline to  
22 file a Notice for Need of Mediation to December 15, 2016.

23  
24 Date: October 7, 2016

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

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27 By: /s/ Celia McGuinness  
CELIA MCGUINNESS, ESQ.  
Attorneys for Plaintiff  
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Date: October 7, 2016

NICOLE MOSS

DENNIS J. HERRERA  
City Attorney  
CHERYL ADAMS  
Chief Trial Deputy  
MARK D. LIPTON  
Deputy City Attorney

By: /s/ Mark D. Lipton  
MARK D. LIPTON, ESQ.  
Attorneys for Defendant  
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 December 1, 2016.

Dated: 10/13, 2016

  
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U.S. Magistrate Judge Kandis A. Westmore

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**FILER’S ATTESTATION**

Pursuant to Local Rule 5-1, I hereby attest that on October 7, 2016, I, Celia McGuinness, attorney with The Law Office of Paul L. Rein., received the concurrence of Mark D. Lipton in the filing of this document.

/s/ Celia McGuinness  
Celia McGuinness