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13 Attorneys for Plaintiff
 14 NICOLE MOSS

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

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA

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

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

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND DEADLINE TO
 MEDIATE UNDER GENERAL ORDER 56**

27 //

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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 Mediation under General Order 56 be continued from March 7, 2017, until May 31, 2017. The
14 relevant history of the case is as follows:

- 15 1. The original date for filing a Notice of Need for Mediation was June 1, 2016, Docket
16 No. 4.
- 17 2. Because the scope of the facilities at San Francisco General Hospital required more time
18 than usual for access experts to prepare a report, the parties stipulated to extend the
19 deadline for Plaintiff to file the Notice of Need for Mediation to December 15, 2016.
20 Docket No. 32.
- 21 3. Plaintiff filed the Notice of Need for Mediation on December 7, 2016. Docket No. 34.
- 22 4. The case was assigned a mediator on January 17, 2017. Docket No. 35.
- 23 5. Pursuant to General Order 56, the parties have 90 days from filing the Notice of Need
24 for Mediation to complete the mediation. Thus, the deadline to complete mediation is
25 March 7, 2017.
26

27 This request for an extension of time is based on the following good cause:

- 28 1. The parties have worked cooperatively to move through General Order 56.

- 1 2. The parties have engaged in significant pre-mediation discussion via telephone
2 conference and email, facilitated by ADR Director Howard Herman.
- 3 3. The Parties agreed to join into this mediation another case, *Moss v. Kindred Healthcare*
4 *Operating, Inc. et al.*, 4:16-cv-00657 YGR. The City of San Francisco is a defendant in
5 that matter as well. The Parties believe that mediating the cases together will facilitate a
6 more efficient resolution of all issues.
- 7 4. Due to the number of party representatives and attorneys involved in the two matters, the
8 Parties were unable to find a mutually agreeable date for mediation within the Court's
9 deadline.
- 10 5. All parties have agreed to participate in mediation on May 9, 2017.

11
12 Therefore, in an effort to keep costs down and to facilitate efficient resolution of the case
13 through mediation and the General Order 56 process, the Parties stipulate and request that the Court
14 order the deadline for mediation to take place under General Order 56 be extended to May 31, 2017.

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16 Date: March 3, 2017

THE LAW OFFICE OF PAUL L. REIN
THE DERBY LAW FIRM, P.C.

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18
19 By: /s/ Celia McGuinness
20 CELIA McGUINNESS, ESQ.
21 Attorneys for Plaintiff
22 NICOLE MOSS

23
24 Date: March 3, 2017

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CHERYL ADAMS
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THOMAS S. LAKRITZ
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25
26 By: /s/ Thomas S. Lakritz
27 THOMAS S. LAKRITZ, ESQ.
28 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 the parties to mediate under General Order 56 is hereby continued to May 31,
2017.

Dated: 3/10, 2017



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 March 3, 2017, I, Celia McGuinness, attorney with The Law Office of Paul L. Rein., received the concurrence of Thomas S. Lakritz in the filing of this document.

/s/ Celia McGuinness
Celia McGuinness