1

26

27

28

1	DENNIS J. HERRERA, State Bar #139669			
2	City Attorney CHERYL ADAMS, State Bar #164194			
3	Chief Trial Deputy THOMAS S. LAKRITZ, State Bar #161234			
4	Deputy City Attorney Fox Plaza			
5	1390 Market Street, 6th Floor San Francisco, California 94102-5408			
6	Telephone: (415) 554-4218 Facsimile: (415) 554-3837			
7	E-Mail: tom.lakritz@sfgov.org			
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 to extend the			
13	deadline to mediate the case to August 18, 2017. This stipulation is based on the following good			
14	cause:			
15	1. The parties have worked cooperatively to move through General Order 56.			
16	2. The parties have engaged in significant pre-mediation discussion via telephone			
17	conference and e-mail, facilitated by ADR Director Howard Herman.			
18	3. The parties previously agreed to mediate the case on May 9, 2017.			
19	4. On May 1, 2017, counsel for the Estate of Nicole Moss informed the other parties			
20	that it was necessary to postpone the mediation to gain a better understanding regarding the status of			
21	the Estate and participate in a meaningful mediation.			
22	5. Due to the number of party representatives and attorneys involved in the two matters			
23	being mediated together, the parties were unable to find a mutually agreeable date for mediation			
24	within the Court's deadline to complete mediation.			
25	6. The parties have conferred with Howard Hermann regarding a new date for			
26	mediation and selected August 17, 2017.			
27	Therefore, in an effort to keep costs down and to facilitate efficient resolution of the case			
28	through mediation and the General Order 56 process, the parties stipulate and request that the Court			

1	order the deadline for mediation to take place under General Order 56 be extended to August 1	
2	2017.	
3		
4		
5	Date: June 26,2017	DERBY, McGUINNESS, & GOLDSMITH, L.P.
6		
7		By: /s/ Celia McGuinness CELIA McGUINNESS, ESQ.
8		Attorneys for Plaintiff
9		NICOLÉ MOSS
10	Date: June 26, 2017	DENNIS J. HERRERA
11		City Attorney CHERYL ADAMS Chief Triel Deputy
12		Chief Trial Deputy THOMAS S. LAKRITZ Deputy City Attorney
13		Deputy City Attorney
14		By:/s/Thomas S. Lakritz
15		THOMAS S. LAKRITZ, ESQ. Attorneys for Defendant
16		CITY AND COUNTY OF SAN FRANCISCO
17		
18		
19		
20		
21		
22		
23		
24		
2526		
20 27		
28		

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 August 18, 2017. Dated: <u>6/27</u>, 2017

1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	

27

28

FILER'S ATTESTATION

Pursuant to Local Rule 5-1, I hereby attest that on June 26, 2017, I, Celia McGuinness, attorney with Derby, McGuinness, & Goldsmith, L.P., received the concurrence of Thomas S. Lakritz in the filing of this document.

/s/ Celia McGuinness
Celia McGuinness