1 2 3 4 5 6 7 8 9 10 11	Alan F. Cohen (State Bar No. 194075) LAW OFFICES OF ALAN F. COHEN 1 Sansome Street, Suite 810 San Francisco, CA 94104 415.984.1943 (tel.) 415.984.1953 (fax) alan@alancohenlaw.com Attorney for Plaintiff Gary Ferras Jason A. Geller (CA SBN 168149) jgeller@laborlawyers.com Juan C. Araneda (CA SBN 213041) jaraneda@laborlawyers.com FISHER & PHILLIPS LLP One Embarcadero Center, Suite 2050 San Francisco, CA 94111 Telephone: 415/490-9000 Facsimile: 415/490-9001	
11 12 13	Attorneys for Defendant HUSQVARNA CONSTRUCTION PRODUCTION OF AMERICA, INC.	CTS
14	UNITED STAT	ES DISTRICT COURT
15	NODTHEDNI DISTRICT OF CALIFORNIA	
16 17	GARY FERRAS, an individual,	Fed. Ct. Case No. 4:16-CV-01081-SBA
18	Plaintiff,	[Removed from Contra Costa County Superior Court, Civil Case No. C16-00131]
19	v.	STIPULATION AND [PROPOSED] ORDER
20	HUSQVARNA CONSTRUCTION	CONTINUING ADR DEADLINE BY THREE WEEKS
21	PRODUCTS NORTH AMERICA, INC.,	
22	HUSQVARNA NORTH AMERICA, HUSQVARNA GROUP, and	
23	DOES 1 through 100 inclusive,	Complaint Filed: January 25, 2016 Trial Date: July 17, 2017
24	Defendants.	j., ., -
25	The parties, Plaintiff Gary Ferr	as and Defendant Husqvarna Construction Products
26	North America, Inc., by and through their atto	rneys of record, hereby stipulate and request that the
27	Court extend the deadline to complete mediation in this action by three weeks after the previous	
28		
		1 Fed. Ct. Case No. 4:16-CV-01081-SBA
	STIPULATIOND AND [PROPOSED	O ORDER CONTINUING ADR DEADLINE

1	deadline due to difficulties accommodating t	he parties' schedules. The parties are set for mediation	
2	on October 19, 2016.	are parties seriedates. The parties are set for mediation	
3	·	6 Stipulation and Order Selecting ADR Process, the	
4		by September 30, 2016. The parties initially agreed on a	
5		d to reschedule due to conflicts that arose after the	
6		the first date available for all parties, including out-of-	
7	1	tor. The parties have agreed to mediate on October 19	
8	-		
9			
10	therefore request that the deadline to complete ADR be continued for three weeks to accommodate this change. This is the first request to continue the mediation deadline.		
11	this change. This is the first request to conti	inue the mediation deadline.	
12			
13	DATED: September 28, 2016	FISHER & PHILLIPS LLP	
14			
15		By: [5]	
16		Jason A. Geller Juan C. Araneda	
17		Attorneys for Defendant HUSQVARNA CONSTRUCTION PROPERTY AND PROPERTY A	
18		PRODUCTS NORTH AMERICA, INC.	
19	DATED: September 28, 2016	LAW OFFICES OF ALAN F. COHEN	
20			
21		By:[S]	
22		ALAN F. COHEN Attorney for Plaintiff	
23		GARY FERRAS	
24			
25	///		
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28	,,,		
		E 1 C C N 444 CW 04004 CD	

1	[PROPOSED] ORDER	
2	Good cause appearing from the Parties' stipulation, the Court hereby orders that the	
3	deadline for completing mediation is extended by three weeks to October 21, 2016.	
4	SO ORDERED.	
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6	Date: 9/30/16 Saundre B Grostrong	
7	Honorable Saundra B. Armstrong UNITED STATES DISTRICT COURT JUDGE	
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STIPULATIOND AND [PROPOSED] ORDER CONTINUING ADR DEADLINE