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6 Attorneys for Plaintiff  
 7 PATRICIA PISONI

8 **UNITED STATES DISTRICT COURT**  
 9  
 10 **NORTHERN DISTRICT OF CALIFORNIA**

12 PATRICIA PISONI,	)	Case No.: C16-02995-KAW
	)	
13 Plaintiff,	)	<b>STIPULATION AND <del>[PROPOSED]</del></b>
	)	<b>ORDER TO EXTEND DEADLINE TO</b>
14 vs.	)	<b>COMPLETE MEDIATION</b>
	)	
15 TARGET CORPORATION, et al.,	)	[Contra Costa Sup. Ct. No. C16-00474]
	)	
16 Defendants.	)	Complaint Filed: 3/15/16
	)	

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 18  
 19 THE PARTIES HEREBY STIPULATE by and through their respective counsel,  
 20 pursuant to Civil L.R. 7, to extend the deadline for conducting mediation in this matter to March  
 21 31, 2017.

22 Good cause exists for extending the mediation deadline as an essential deposition of  
 23 Plaintiff’s surgeon Dr. Ramiro Miranda concerning the causal connection of Plaintiff’s knee  
 24 replacement to the subject accident is currently on calendar for January 18, 2017. This deposition  
 25 will be necessary before the case can be mediated and the date of January 18, 2017 is the earliest  
 26 date the doctor is available. Plaintiff’s counsel is set for trial in the matter of DeMuyne v.  
 27 BARTD, et al. on January 23, 2017 and is unavailable for mediation until after February 1, 2017.

28 A new mediation date has yet to be set. The mediator, William F. Murphy, has agreed to

1 set a new date upon the granting of this motion.

2 This Stipulation may be signed in counterparts.

3  
4 Dated: December 28, 2016

By: /s/ Edward M. Mastrangelo  
EDWARD MASTRANGELO, ESQ.  
Attorney for Plaintiff  
PATRICIA PISONI

5  
6  
7 Dated: December 28, 2016

By: /s/ Gail C. Trabish, Esq.  
GAIL C. TRABISH, ESQ.  
Attorney for Defendant  
TARGET CORPORATION

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12 UNITED STATES DISTRICT COURT  
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14 NORTHERN DISTRICT OF CALIFORNIA

15 PATRICIA PISONI,

16 Plaintiff,

17 vs.

18 TARGET CORPORATION, et al.,

19 Defendants.

) Case No.: C16-02995-KAW

) ~~Proposed~~ ORDER TO EXTEND  
) DEADLINE TO COMPLETE  
) MEDIATION

) [Contra Costa Sup. Ct. No. C16-00474]

) Complaint Filed: 3/15/16

20 The parties' Stipulation is adopted and IT IS SO ORDERED that the deadline for  
21 Mediation in this matter be extended to March 31, 2017.

22 Dated: 1/4/17

23   
24 KANDIS A. WESTMORE  
25 Magistrate Judge  
26  
27  
28