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11 Attorneys for Defendants
 12 NORTHSTAR FEDERAL SERVICES, INC.

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA

16 DENNIS BROWN, an individual,

17 Plaintiff,

18 v.

19 DYNAMIC MANAGEMENT SOLUTIONS
 FACILITY SERVICES, LLC; NORTHSTAR
 20 FEDERAL SERVICES, INC.; and DOES 1
 through 50, inclusive,

22 Defendants.

Case No. 4:16-cv-06864-KAW

**STIPULATION TO CONTINUE
 MEDIATION DEADLINE AND CASE
 MANAGEMENT CONFERENCE;
 [PROPOSED] ORDER AS MODIFIED**

Complaint Filed: November 29, 2016

23
 24 Plaintiff DENNIS BROWN and Defendant NORTHSTAR FEDERAL SERVICES, INC.,
 25 through their attorneys' of record, hereby stipulate as follows:

26 WHEREAS the Plaintiff filed his Complaint for Damages on November 29, 2016. (Dkt.
 27 No. 1.) and on April 12, 2017, the Court ordered the parties to participate in mediation within 120
 28 days from the date of the order, which is August 10, 2017. (Dkt. No. 23.) The Court appointed

1 Andrew R. Weiner as the mediator. (Dkt. No. 24.) The parties scheduled the mediation for
2 August 9, 2017.

3 WHEREAS, the parties have determined that the case is not ready for mediation due to
4 the fact that Plaintiff has not completed his document production or provided supplemental
5 discovery responses, and is not available for his deposition noticed for July 27, 2017.
6 Accordingly, the ADR deadline should be continued to ensure that Defendant has responses to its
7 first set of discovery, can depose Plaintiff and both parties can meaningfully participate in
8 mediation, as more fully set forth below:

9 (a) On April 14, 2017, Defendant served Request for Production of Documents, Set
10 One (“Requests”) and Interrogatories, Set One on Plaintiff. Plaintiff served responses on May 15,
11 2017, however, Plaintiff did not provide any documents.

12 (b) The parties met and conferred and Plaintiff agreed to provide supplemental
13 discovery responses by June 8, 2017. On June 8, 2017, Plaintiff produced 158 pages. No
14 supplemental discovery responses were provided. As a result of further meet and confer, Plaintiff
15 agreed to provide supplemental discovery responses by June 20, 2017. To date, no supplemental
16 responses have been served but Plaintiff anticipates the supplemental responses will be served
17 within two weeks by August 1, 2017.

18 (c) On July 7, 2017, Plaintiff produced approximately 22,000 pages of documents.
19 Plaintiff currently anticipates an additional several thousand pages of documents will be produced
20 by the week of July 17, 2017. It will takes weeks for counsel for Defendant to review Plaintiff’s
21 supplemental production.

22 (d) The parties anticipate further meet and confer discussions regarding the scope of
23 production and supplemental discovery responses once served.

24 (e) Plaintiff’s deposition was initially noticed on May 22 for June 20, 2017 after
25 counsel for Defendant did not receive any objection to the date. When it became apparent that
26 Defendant would not receive the necessary discovery to proceed with the deposition, the
27 deposition was re-noticed for July 20, 2017 to allow Plaintiff time to provide additional
28 documents. The deposition was again moved to July 27, 2017, to allow Plaintiff further time to

1 comply with discovery. On July 13, 2017, counsel for Plaintiff advised Defendant that Plaintiff is
2 unavailable on July 27, 2017 and since he resides out of state would prefer to schedule the
3 mediation a few days before the mediation. Defendant is amenable to the request but, to date, the
4 parties have not selected a new deposition date in light of the above discovery issues.

5 WHEREAS, the parties previously filed a stipulation to extend time for Defendant to file a
6 responsive pleading (Dkt. No. 11) and to extend the initial Case Management Conference and
7 attendant discovery deadlines (Dkt. No. 15). The parties attended the Initial Case Management
8 Conference on May 30, 2017.

9 WHEREAS, to allow Plaintiff sufficient time to provide supplemental responses to the
10 Requests and Interrogatories and to provide all responsive documents, and to provide Defendant
11 sufficient time to review the materials, depose Plaintiff, and prepare for the mediation, the parties
12 believe it is appropriate to continue the mediation deadline until November 30, 2017.

13 THEREFORE, IT IS HEREBY STIPULATED between the parties, through their
14 respective counsel of record, a joint request for continuance of the mediation deadline until
15 November 30, 2017.

16 Dated: July 13, 2017

LAW OFFICES OF DANIEL FEDER

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18 By: /s/ Daniel Feder
Daniel Feder
Attorneys for Plaintiff
DENNIS BROWN

19
20
21 Dated: July 13, 2017

JACKSON LEWIS P.C.

22
23 By: /s/ Denise Trani-Morris
Denise Trani-Morris
Janelle J. Sahouria
Attorneys for Defendants

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[PROPOSED] ORDER

BASED ON THE PARTIES' STIPULATION, THE COURT'S FILE, AND GOOD CAUSE SHOWN, THE COURT ORDERS AS FOLLOWS:

The mediation deadline is continued until November 30, 2017, and the Case Management Conference is moved from August 29, 2017 to December 12, 2017.

IT IS SO ORDERED:

DATED: 7/24/17



Hon. Kandis A. Westmore
Magistrate Judge of the United States
District Court