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 8 AMERICAN SHIP MANAGEMENT, LLC

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION

12 DANIEL GABAREE,

13 Plaintiff,

14 vs.

15 AMERICAN SHIP MANAGEMENT, LLC,

16 Defendant.

Case No.: C-03-1325-PJH

STIPULATION AND [PROPOSED]
 ORDER EXTENDING MEDIATION
 DEADLINE

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 21 The Court has set a private mediation deadline of February 1, 2004. Plaintiff Gabaree's
 22 deposition and independent medical examination have been scheduled for February 5, 2004.
 23 Because Gabaree has been at sea for extended periods since discovery has opened in this case,
 24 that was the earliest date that those discovery events could be scheduled. The parties have
 25 scheduled a private mediation for March 11, 2004, before former Judge Al Chiantelli of ADR
 26 Services. The parties therefore stipulate and request the Court to order that the mediation
 27 deadline be extended through March 31, 2004. This is the first request for extension of this

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1 deadline. Trial is scheduled for November 15, 2004.

2 Dated: December 24, 2003

EMARD, DANOFF, PORT & TAMULSKI, LLP

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By _____ /s/

Eric Danoff
Attorneys for Defendant
American Ship Management, LLC

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9 Dated: December ___, 2003

LAW OFFICES OF LYLE C. CAVIN, JR.

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By _____ /s/

Alfred G. Johnson
Attorneys for Plaintiff
Daniel Gabaree

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The filer contests that concurrence in the filing of this document has been obtained from plaintiff's attorney Alfred Johnson of the Law Offices of Lyle C. Cavin, Jr.

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ORDER: The deadline for the parties to complete private mediation is extended through March 31, 2004.

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U.S. District Judge

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