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 14 **Defendant, Pro Se**

15 **UNITED STATES DISTRICT COURT**
 16 **NORTHERN DISTRICT OF CALIFORNIA**
 17 **SAN JOSE DIVISION**

18 **JOE HAND PROMOTIONS, INC.,**

19 **Case No. 5:10-cv-01614-LHK**

20 **Plaintiff,**

21 **STIPULATION OF PLAINTIFF JOE**
 22 **HAND PROMOTIONS, INC. AND**
 23 **DEFENDANT THOMAS RICH**
 24 **McINNIS STIPULATION TO EXTEND**
 25 **THE ADR DEADLINE; AND ORDER**
 26 **(Proposed)**

27 **v.**

28 **THOMAS RICH McINNIS, et al.**

29 **Defendant.**

30 **TO THE HONORABLE LUCY H. KOH, THE PARTIES, AND THEIR**
 31 **ATTORNEY/S OF RECORD:**

32 By and through their counsel, Plaintiff Joe Hand Promotions, Inc., and Defendant Thomas Rich
 33 McInnis, hereby agree, stipulate, and respectfully request that this Honorable Court extend the ADR
 34 deadline in the instant action from February 28, 2011 to April 7, 2011 pursuant to ADR Local Rule 6-
 35 5¹.

36 _____
 37 ¹ Plaintiff's counsel and defendant Thomas Rich McInnis sincerely apologize that this Stipulation is filed late and not
 38 fourteen (14) days or more beyond the presently scheduled ADR deadline of February 28, 2011. Due to difficulties in
 Plaintiff's counsel reaching defendant McInnis and Mr. McInnis reaching Plaintiff's counsel throughout the month of
 February 2011, their participation in the pre mediation teleconference with Court appointed mediator Vicki Veenker was
 delayed, which in turn delayed preparation and filing of this Stipulation.

