

**** E-filed January 6, 2011 ****

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

MIGUEL OROZCO GARDUÑO,

Plaintiff,

v.

TITAN LABORATORIES, INC. and
HARVEY BERGER,

Defendants.

No. C 10-05281 HRL

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER**

Plaintiff Miguel Orozco Garduño and Defendants Titan Laboratories, Inc. and Harvey

Berger, by the undersigned attorneys, jointly stipulate as follows:

1. The Department of Justice, on behalf of Plaintiff Orozco, filed the Complaint in this action on November 22, 2010, and served the Complaint by U.S. mail on Defendants, seeking a waiver of summons. Assuming Defendants waive formal service, their response is due on or before January 21, 2011.

2. Pursuant to the Order Setting Initial Case Management Conference and ADR Deadlines entered by the Court on November 22, 2010, the parties must meet and confer regarding initial disclosures, early settlement, ADR process selection, and discovery plan; file ADR Certification signed by parties and counsel; and file either Stipulation to ADR Process or Notice of Need for ADR Phone Conference by January 4, 2011.

3. The parties have reached an agreement in principle to resolve this case, and intend to file a consent decree embodying the terms of the settlement for judicial approval within the next two weeks.

4. Due to the anticipated settlement of this case, the parties respectfully request that the Court enter this stipulation as an Order, extending the deadlines set forth in the Order Setting Initial Case Management Conference and ADR Deadlines by two weeks while the parties finalize the details of the consent decree for submission and approval.

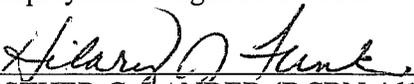
Date: January 4, 2011

Respectfully submitted,

For Plaintiff:

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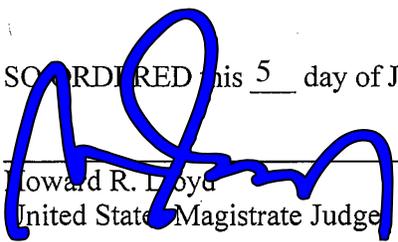
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SO ORDERED this 5 day of January, 2011


Howard R. Loya
United States Magistrate Judge

The initial case management conference is continued to February 8, 2011, and all related Rule 26 and ADR deadlines are continued accordingly.