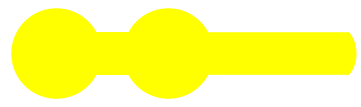


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FRED ALVAREZ (SBN 68115)  
ALLISON B. MOSER (SBN 223065)  
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Attorneys for Defendants  
NEXGEN HEALTHCARE, INC. and ROMUALDO  
GERONIMO



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

EVELYN EDRA,  
  
Plaintiff,  
  
v.  
  
NEXGEN HEALTHCARE, INC., THE  
TERRACES OF LOS GATOS, and  
ROMUALDO GERONIMO  
  
Defendants.

Civil Action No. CV13-0227 RMW

**JOINT STIPULATION AND  
~~PROPOSED~~ ORDER TO  
CONTINUE ADR DEADLINE**

1 Pursuant to USDC Local Civil Rules 6-2 and 7-12, Plaintiff Evelyn Edra and Defendants  
2 NexGen Healthcare, Inc., Romualdo Geronimo and American Baptist Homes of the West, dba  
3 The Terraces of Los Gatos, (“the Parties”) hereby stipulate and agree as follows:

4 WHEREAS the Parties agreed to complete an Early Neutral Evaluation as a form of  
5 Alternative Dispute Resolution (“ADR”) process;

6 WHEREAS the Parties were ordered by the Court to complete an Early Neutral  
7 Evaluation by July 17, 2013;

8 WHEREAS the Parties have an Early Neutral Evaluation scheduled for July 16, 2013,  
9 with briefs to be submitted by July 8, 2013;

10 WHEREAS the Parties are currently actively engaged in settlement communications and  
11 would like to continue to pursue such negotiations without spending the time and resources to  
12 prepare for the currently scheduled July 16, 2013 Early Neutral Evaluation;

13 WHEREAS the Parties are currently in the process of exchanging documents in order to  
14 assist in their settlement discussions; and

15 WHEREAS the extension of the ADR deadline will not impact any other currently  
16 scheduled deadlines.


17 NOW THEREFORE, the Parties, by and through their undersigned counsel, hereby  
18 stipulate and agree as follows:

19 The Parties hereby jointly request that the Court postpone the Parties deadline for  
20 completing ADR/Early Neutral Evaluation for 45 days, from July 17, 2013 until August 31, 2013.

21 IT IS SO STIPULATED.

22  
23 Dated: June 25, 2013

JONES DAY

24  
25 By:   
Allison B. Moser

26 Attorneys for Defendants  
27 NexGen Healthcare, Inc. and Romualdo  
28 Geronimo

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Dated: June \_\_\_\_, 2013

VAN DERMYDEN ALLISON LAW  
CORPORATION

By: \_\_\_\_\_  
Alexander M. Sperry

Attorneys for Defendant  
American Baptist Homes of the West, dba  
The Terraces of Los Gatos

Dated: June \_\_\_\_, 2013

ROBERT DAVID BAKER, INC.

By: \_\_\_\_\_  
Robert David Baker

Attorney for Plaintiff Evelyn Edra

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: \_\_\_\_\_

\_\_\_\_\_  
Honorable Ronald M. Whyte  
United States District Judge

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Dated: June \_\_, 2013

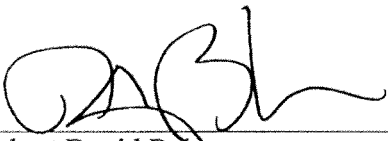
VAN DERMYDEN ALLISON LAW CORPORATION

By: \_\_\_\_\_  
Alexander M. Sperry

Attorneys for Defendant  
American Baptist Homes of the West, dba  
The Terraces of Los Gatos

Dated: June <sup>25</sup> \_\_, 2013

ROBERT DAVID BAKER, INC.

By:   
Robert David Baker

Attorney for Plaintiff Evelyn Edra

PURSUANT TO STIPULATION, IT IS SO ORDERED.


Date: \_\_\_\_\_

\_\_\_\_\_  
Honorable Ronald M. Whyte  
United States District Judge

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Dated: June 24, 2013

VAN DERMYDEN ALLISON LAW CORPORATION

By:   
Alexander M. Sperry

Attorneys for Defendant  
American Baptist Homes of the West, dba  
The Terraces of Los Gatos

Dated: June \_\_\_\_, 2013

ROBERT DAVID BAKER, INC.

By: \_\_\_\_\_  
Robert David Baker

Attorney for Plaintiff Evelyn Edra

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: \_\_\_\_\_



Honorable Ronald M. Whyte  
United States District Judge