

E-FILED: August 21, 2013

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 Attorney for Plaintiff
 5 Pacific Gas and Electric Company

6 UNITED STATES DISTRICT COURT
 7 NORTHERN DISTRICT OF CALIFORNIA

<p>9 PACIFIC GAS AND ELECTRIC COMPANY, a California Company 10 Plaintiff. 11 vs. 12 SIMON PROPERTY GROUP, INC. and DOES 1-10, inclusive, 13 Defendants. 14</p>	<p>) Case No. CV13-1043-HRL)) STIPULATION TO EXTEND) DEADLINE FOR COMPLETION OF) ALTERNATIVE DISPUTE) RESOLUTION; PROPOSED ORDER)) Current Deadline: September 18, 2013) Proposed New Date: October 18, 2013</p>
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16 Pursuant to Civil L.R. 5-5, the parties represent as follows:

17 The parties attempted to timely exchange their initial disclosures pursuant to the
 18 joint case management statement filed in this matter. Both firms have had issues with their mail
 19 and due to an unknown reason, Defendant's initial disclosure production was not received until
 20 August 17, 2013. Both parties agree that in order to properly present their case to the Early
 21 Neutral Evaluator, they will need to conduct some preliminary discovery, including depositions.
 22 Plaintiff is unprepared to make determinations as to which depositions and/or discovery to
 23 conduct until it has had the opportunity to review the initial disclosures. Given that the Early
 24 Neutral Evaluator has requested statements be provided ten (10) days before the hearing, such
 25 would require the parties to complete the initial disclosures and preliminary discovery by
 26 September 8, 2013. Neither party believes this is possible in light of their current obligations and
 27 both feel such initial discovery is necessary to make the Early Neutral Evaluation as meaningful
 28 as possible.

1 The parties conducted their initial telephonic session with the Early Neutral
2 Evaluator on August 16, 2013 and they agreed that a short continuance through October 18, 2013
3 would be appropriate and the Early Neutral Evaluator, Samuel Barnum, also agreed that such was
4 reasonable.

5 IT IS HEREBY STIPULATED that the current deadline of September 18, 2013
6 for completion of alternative dispute resolution should be continued until October 18, 2013.

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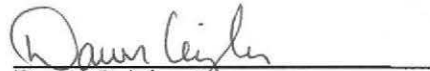
9 Dated: August 20, 2013



Samuel S. Baxter, Esq.
Counsel for Defendant Simon Property Group, Inc.

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11 Dated: August 20, 2013



Dawn Ceizler, Esq.
Counsel for Plaintiff Pacific Gas and Electric
Company

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15 The stipulation of the parties having been considered by the Court, and good cause
16 appearing,

17 IT IS SO ORDERED

18 Dated: August 21 2013



Howard R. Lloyd
United States Magistrate Judge

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