

E-FILED: June 28, 2013

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 11 BAYKEEPER

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14 SAN JOSE DIVISION

15 SAN FRANCISCO BAYKEEPER, a non-profit
 16 corporation,

17 Plaintiff,

18 v.

19 PREMIER RECYCLE COMPANY,

20 Defendant.

Civil No. C 13-01695 HRL

**STIPULATION TO CONTINUE CASE
 MANAGEMENT CONFERENCE AND
 ASSOCIATED DEADLINES; ~~PROPOSED~~
 ORDER**

Fed. R. Civ. P. 26(f); L.R. 16-10

Honorable Howard R. Lloyd

1 Plaintiff San Francisco Baykeeper (“Baykeeper”) and Defendant Premier Recycle Company
2 (“Premier Recycle”) in the above-captioned action respectfully submit this stipulation as follows:

3 **WHEREAS**, Baykeeper and Premier Recycle (collectively, the “Parties”) have been working
4 together in good faith to reach a settlement in this action;

5 **WHEREAS**, the Court’s Order Setting Initial Case Management Conference and ADR
6 Deadlines (“Scheduling Order”) set the initial Case Management Conference in this matter for July 23,
7 2013 at 1:30 pm;

8 **WHEREAS**, the Scheduling Order states that if the Initial Case Management Conference is
9 continued, the other deadlines are continued accordingly;

10 **WHEREAS**, the Parties desire to continue negotiating settlement in good faith and anticipate
11 reaching a final settlement in this action within the next six (6) weeks;

12 **NOW, THEREFORE, THE PARTIES STIPULATE AS FOLLOWS:**

- 13 1. The Case Management Conference shall be continued to August 20, 2013 at 1:30 pm, or
14 as soon thereafter as the Court is available.
- 15 2. The Parties’ ADR certifications and stipulations to ADR process or notices of need for
16 an ADR phone conference shall be due two weeks before the Case Management
17 Conference.
- 18 3. The Parties’ Rule 26(f) Report and Joint Case Management Statement shall be due one
19 week before the Case Management Conference.
- 20 4. The Parties shall make initial disclosures or state objections in their Rule 26(f) Report no
21 later than one week before the Case Management Conference.

22 Dated: June 27, 2013

23 Respectfully submitted,
24 By: /s/ Andrea Kopecky
25 Andrea Kopecky
26 Attorney for Plaintiff
27 SAN FRANCISCO BAYKEEPER
28 By: /s/ Anna Le May
Anna Le May
Attorney for Defendant
PREMIER RECYCLE

1 **[PROPOSED] ORDER**


2
3 GOOD CAUSE APPEARING,

- 4 1. The Case Management Conference shall be continued to _____ **8/20/13** _____ at 1:30
5 pm. **Related deadlines are adjusted accordingly.**
- 6 2. ~~The ADR certifications and stipulations to ADR process or notices of need for an ADR~~
7 ~~phone conference shall be filed no later than _____.~~
- 8 3. ~~The Parties' Rule 26(f) Report and Joint Case Management Statement shall be filed no~~
9 ~~later than _____.~~
- 10 4. ~~The Parties shall make initial disclosures or state objections in their Rule 26(f) Report no~~
11 ~~later than _____.~~

12 **IT IS SO ORDERED.**

13
14 Date: _ June 28, 2013

NORTHERN DISTRICT OF CALIFORNIA

15
16 
17 _____
18 Honorable Howard R. Lloyd
19 ~~United States District Court~~
20 United States Magistrate Judge