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American Airlines, Inc.

7 UNITED STATES DISTRICT COURT  
8 NORTHERN DISTRICT OF CALIFORNIA  
9 SAN JOSE DIVISION

11 PEILIN CHANG	)	Case No. 15-cv-02604-RMW
	)	
12 Plaintiff,	)	
	)	<b>STIPULATION AND ORDER</b>
13 v.	)	<b>EXTENDING TIME TO COMPLETE</b>
	)	<b>MEDIATION</b>
14 AMERICAN AIRLINES, INC.,	)	
	)	
15 Defendant.	)	Judge: Honorable Ronald M. Whyte
	)	Courtroom: 6, 4 <sup>th</sup> Floor
	)	
16	)	
17	)	

18  
19 The parties in the above-captioned matter hereby stipulate as follows:

- 20 1. WHEREAS the current scheduling order of April 14, 2016 provides for a deadline to  
21 complete private mediation of August 31, 2016.
- 22 2. WHEREAS the parties have been diligently engaged in discovery, including the following:
- 23 a. Arranging for two defense medical examinations of plaintiff: a neurological  
24 examination that was completed on July 11, 2016 and a neuropsychological  
25 examination to be conducted on August 30, 2016;
- 26 b. Completing depositions of plaintiff (7/11/16), plaintiff’s treating physician Dr. Rosen  
27 (7/29/16), employees of plaintiff’s medical practice (8/19/16 and 8/22/16), and  
28 bookkeepers and accountants for plaintiff’s medical practice (8/18/16, 8/19/16 and

1 8/22/16);

2 c. Scheduling additional depositions, including the deposition of plaintiff's neurologist,  
3 Dr. Helman (originally scheduled on 8/22/16 but continued to 9/20/16 at the request  
4 of the witness), and plaintiff's colleague, Dr. Lubben (9/9/16);

5 d. Conferring regarding additional depositions to be set, including the flight attendant  
6 involved in the subject incident.

7 3. Notwithstanding the parties' diligent efforts, the case is not yet ripe for mediation. Plaintiff  
8 alleges that she has sustained significant and permanent injuries and a significant loss of  
9 income. These claims require further investigation before a meaningful mediation can be  
10 conducted.

11 4. Therefore the parties propose that the deadline to conduct private mediation be extended by  
12 approximately 80 days, from August 31, 2016 to November 18, 2016.

13  
14 IT IS SO STIPULATED.

15  
16 Dated: August 26, 2016

BROWNSTEIN THOMAS, LLP

17  
18 By: /s/ Stephen Gorog  
19 STEPHEN GOROG  
Attorneys for plaintiff Peilin Chang

20  
21 Dated: August 26, 2016

THE RYAN LAW GROUP

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23 By: /s/ Rebekka Martorano  
24 REBEKKA R. MARTORANO  
25 Attorneys for Defendant American Airlines,  
26 Inc.

1 **ORDER**

2 Based on the stipulation of the parties and good cause appearing, IT IS HEREBY ORDERED  
3 that the deadline to conduct private mediation is extended from August 31, 2016 to November 18,  
4 2016. 2/2/2017 Pretrial Conference and 2/21/2017 Jury Trial to remain as presently set.

5  
6 **IT IS SO ORDERED.**

7  
8 Dated: 8/29/2016

*Ronald M. Whyte*  
Judge, United States District Court