

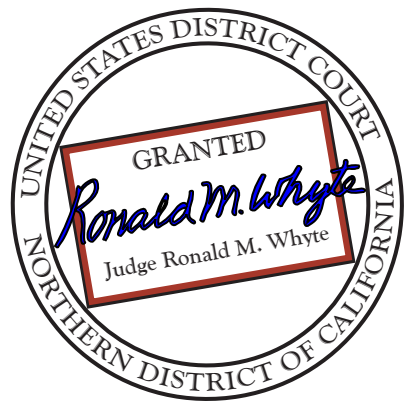
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15 Attorneys for Plaintiff
 16 DMITRY YANUSHKEVICH



17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA**

20 DMITRY YANUSHKEVICH,
 21 Plaintiff,
 22 v.
 23 WALGREEN CO., an Illinois corporation
 24 d/b/a WALGREENS #03344; and DOES 1
 through 10, inclusive,
 25 Defendant.

Case No. 5:15-cv-04964

**STIPULATION TO ENLARGE TIME FOR
 DEFENDANT WALGREEN CO. TO
 RESPOND TO PLAINTIFF'S MOTION TO
 ENFORCE SETTLEMENT AND FOR
 CONTINUATION OF THE HEARING ON
 THE MOTION TO ENFORCE
 SETTLEMENT**

Date: September 2, 2016
 Time: 9:00 a.m.
 Crtm: Courtroom 6

Complaint filed: October 28, 2015

1 This stipulation is entered into by and between Plaintiff Dmitry Yanushkevich (“Plaintiff”),
2 on the one hand, and Defendant Walgreen Co. (“Defendant”) (collectively “the Parties), on the
3 other hand, by and through their undersigned counsel of record, with reference to the following
4 facts and recitals:

5 WHEREAS, on July 25, 2016, Plaintiff filed a Notice of Motion and Motion to Enforce
6 Settlement;

7 WHEREAS, on August 2, 2016, the Parties appeared before Mediator Tamara Lange for a
8 pre-mediation phone conversation.

9 WHEREAS, during the August 2, 2016 pre mediation conversation, the Parties began to
10 have effective conversations regarding amicably resolving their dispute without the need for
11 Plaintiff’s Motion to Enforce Settlement or Mediation;

12 WHEREAS, the Parties have agreed to continue settlement conversations to resolve their
13 disputes with the guidance of the mediator;

14 WHEREAS, Defendant’s deadline to file an opposition to Plaintiff’s Motion to Enforce
15 Settlement is August 8, 2016.

16 WHEREAS, the hearing on Plaintiff’s Motion to Enforce Settlement is currently scheduled
17 for September 2, 2016.

18 WHEREAS, the Parties believe it is more efficient to spend their time attempting to resolve
19 their disputes then engage in Motion practice.

20 WHEREAS, this stipulated request is filed more than 14 days before the September 2, 2016
21 hearing and therefore the stipulation does not violation Civil Local Rule 6-1(b).

22 It is therefore STIPULTED AND AGREED, by and between the undersigned counsel and
23 pursuant to Civil Local Rule 6-2, that the time for Defendant to oppose Plaintiff’s Motion to
24 Enforce Settlement shall be continued to September 23, 2016 and the hearing on Plaintiff’s Motion

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1 to Enforce Settlement shall be continued to October 14, 2016. Plaintiff may also submit a Reply
2 brief per the Local Rules and the Federal Rules of Civil Procedure.

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4 DATED: August 4, 2016

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

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By: /s/ Michael D. Thomas

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Laura D. Heckathorn
Michael D. Thomas

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Attorneys for Defendant
WALGREEN CO.

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DATED: August 4, 2016

LAW OFFICE OF IRENE KARBELASHVILI

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By: /s/ Irene Karbelashvili

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Irene Karbelashvili
Irakli Karbelashvili

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Attorneys for Plaintiff
DMITRY YANUSHKEVICH

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SIGNATURE ATTESTATION

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Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this

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document has been obtained from the other signatories.

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DATED: August 4, 2016

By: /s/ Michael D. Thomas

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