

1 David P. Morales, SBN 191229
2 THE MORALES LAW FIRM
3 560 S. Hamilton Avenue, Suite 500
4 San Jose, CA 95128
5 Telephone: (408) 850-2101
6 Facsimile: (866) 406-6080
7 dmorales@moralesslawfirm.com

8 Attorney for Defendants and Cross-Claimant

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11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA
13
14 SAN FRANCISCO DIVISION

15 LYNDA JANES DANGERFIELD,

16 Civil Action No.: C09-04397 JL

17 Plaintiff,

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**JOINT REQUEST TO EXTEND ADR
DEADLINE AND TO CONTINUE
CASE MANAGEMENT CONFERENCE**

vs.

20 SUE FOX; and ETIQUETTE SURVIVAL
21 LLC,

22 Defendants.

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AND RELATED CROSS-CLAIM.

JOINT REQUEST

29 TO THE HONORABLE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS
30 OF RECORD:

31 WHEREAS, on or about August 13, 2010, the parties participated in mediation for this
32 matter, but no settlement was reached;

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**JOINT REQUEST TO EXTEND MEDIATION DEADLINE AND TO CONTINUE
CASE MANAGEMENT CONFERENCE**

1 WHEREAS, on September 1, 2010, a Case Management Conference was held, during
2 which the Court referred the parties to an early Settlement Conference with Magistrate Judge
3 Edward M. Chen, and scheduled further case management for January 5, 2011;

4 WHEREAS, on September 7, 2010, the Court scheduled the Settlement Conference with
5 Magistrate Judge Chen for December 16, 2010;

6 WHEREAS, on November 17, 2010, the Court re-scheduled the Case Management
7 Conference for January 12, 2011;

8 WHEREAS, in or about November 2010 plaintiff Dangerfield became unavailable to
9 complete her responses to Defendants' pending discovery requests due to a personal family
10 matter;

11 WHEREAS, on November 18, 2010, Defendants granted Plaintiff's request for a two-
12 week extension of time to respond to Defendants' discovery requests, resulting in an agreed
13 discovery response deadline of December 6, 2010;

14 WHEREAS, on December 6, 2010, Plaintiff requested an additional one-week extension
15 of time to respond to Defendants' discovery requests;

16 WHEREAS, on December 6, 2010, Defendants granted Plaintiff's second request for
17 additional time to respond to discovery, until December 13, 2010, provided the parties sought
18 and obtained a continuance of the Settlement Conference and subsequent Case Management
19 Conference to ensure that this discovery would be received prior to the Settlement Conference
20 scheduled for December 16, 2010;

21 WHEREAS, on December 9, 2010, the parties made a joint request that the Court
22 continue the ADR deadline and subsequent Case Management Conference date in order to allow
23 Defendants' pending discovery to be completed, and to allow the Settlement Conference to be
24 rescheduled according to the availability of Magistrate Judge Chen and the parties;

25 WHEREAS, on December 13, 2010, the Court granted the parties' request to continue the
26 ADR deadline and Case Management Conference.

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28 **JOINT REQUEST TO EXTEND MEDIATION DEADLINE AND TO CONTINUE
CASE MANAGEMENT CONFERENCE
Case No.: C09-04397 JL**

1 WHEREAS, on February 22, 2011, the parties participated in an Early Settlement
2 Conference with Magistrate Judge Edward M. Chen, but no settlement was reached;

3 WHEREAS, Magistrate Judge Chen instructed the parties to complete additional
4 discovery and to return for another Settlement Conference with him on May 27, 2011, at 1:00
5 p.m.;

6 NOW, THEREFORE, the parties hereby stipulate and respectfully request that the Court
7 enter an order extending the ADR deadline in this matter until approximately June 3, 2010 and
8 continuing the Case Management Conference in this matter, currently scheduled for March 2,
9 2011, at 10:30 a.m., until June 15, 2011, at 10:30 a.m., or until the Court's soonest available date
10 thereafter.

11 IT IS SO STIPULATED.

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13 Dated: February 23, 2011

THE MORALES LAW FIRM

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15 By: /S/ David P. Morales
16 DAVID P. MORALES
17 Attorney for Defendants and Cross-
Claimant

18 Dated: February 23, 2011

BURKE, WILLIAMS & SORENSEN, LLP

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20 By: /S/ Doug Dal Cielo
21 DOUG DAL CIELO
22 Attorneys for Plaintiff

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28 **JOINT REQUEST TO EXTEND MEDIATION DEADLINE AND TO CONTINUE
CASE MANAGEMENT CONFERENCE
Case No.: C09-04397 JL**

1 **[PROPOSED] ORDER**
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4 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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7 Date: February 24, 2011
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11 HON. JAMES LARSON
12 United States Magistrate Judge
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**JOINT REQUEST TO EXTEND MEDIATION DEADLINE AND TO CONTINUE
CASE MANAGEMENT CONFERENCE
Case No.: C09-04397 JL**