

SEYFARTH SHAW LLP
Ari Hersher (SBN 260321)
ahersher@seyfarth.com
Robin E. Devaux (SBN 233444)
rdevaux@seyfarth.com
560 Mission Street, 31st Floor
San Francisco, California 94105
Telephone: (415) 397-2823
Facsimile: (415) 397-8549

Attorneys for Defendant
ALVAREZ & MARSAL HOLDINGS, LLC

LAW OFFICES OF DANIEL FEDER
Daniel L. Feder (SBN 130867)
daniel@dfederlaw.com
235 Montgomery Street Suite 1019
San Francisco, CA 94104
Telephone: (415) 391-9476
Facsimile: (415) 391-9432

Attorneys for Plaintiff
IHSAN AZIZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IHSAN AZIZ,
Plaintiff,
v.
ALVAREZ & MARSAL HOLDINGS, LLC,
Defendant.

) Case No. 4-22-cv-00229-HSG
)
)
)
**JOINT STIPULATION TO CONTINUE
MEDIATION DEADLINE; ORDER**
)
)
)
)
)
)
Action Filed: January 13, 2022
Trial Date: April 10, 2023
)
)
)
)
)

JOINT STIPULATION TO CONTINUE MEDIATION DEADLINE; [PROPOSED] ORDER
Case No. 4-22-cv-00229-HSG

1 Defendant Alvarez & Marsal Holdings, LLC (“Defendant” or “A&M”) and Plaintiff Ihsan Aziz
 2 (“Plaintiff”) (collectively, the “Parties”), by and through their counsel, and pursuant to N.D. Cal. L.R. 7-
 3 12 and N.D. Cal. ADR L.R. 6-5, hereby stipulate and jointly request that the Court continue by 30 days
 4 the deadline to complete the mediation in this matter, currently set for July 19, 2022. The basis for the
 5 Parties’ request is as follows:

6 1. On April 20, 2022, the Court granted the Parties’ stipulation and request for a referral to
 7 the Northern District of California’s mediation program. Dkt. 22. The Court set the deadline for
 8 completing the mediation as 90 days from the date of the order, or July 19, 2022. *Id.*

9 2. Nearly three weeks later, on May 9, 2022, the Court appointed Frank Burke as mediator.
 10 Dkt. 25. On May 11, 2022, the Court vacated Mr. Burke’s appointment. Dkt. 26. Nine days later (and
 11 one month after the Court’s order referring this matter to mediation), on May 20, 2022, the Court
 12 appointed Todd Roberts as mediator. Dkt. 27.

13 3. Due to scheduling conflicts, the Parties were unable to schedule the initial conference call
 14 with Mr. Roberts until June 6, 2022. No mediation date has yet been scheduled.

15 4. Because of the delays associated with selecting a mediator, and scheduling challenges
 16 posed by upcoming hearings and depositions in other matters over the next six weeks, the Parties do not
 17 believe that mediation can be completed by the current deadline of July 19, 2022, and respectfully
 18 request a brief, 30-day extension on the deadline to complete mediation.

19 5. The Parties have not previously requested a continuance of any deadlines in this case.

20 6. Given that trial is not set to occur until April 2023, the continuance of the mediation
 21 deadline for this short period will not unduly delay the resolution of this matter. Continuing the
 22 mediation deadline will also not impact any of the other deadlines currently set in this matter.

23 THEREFORE, the Parties STIPULATE and request as follows:

24 1. That the Court extend the mediation deadline to August 18, 2022.

25 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD

1 DATED: June 6, 2022

LAW OFFICES OF DANIEL FEDER

3 By: /s/ Daniel L. Feder

4 Daniel L. Feder

5 Attorneys for Plaintiff
IHSAN AZIZ

6 DATED: June 6, 2022

SEYFARTH SHAW LLP

8 By: /s/ Robin E. Devaux

9 Ari Hersher
Robin E. Devaux

10 Attorneys for Defendant
11 ALVAREZ & MARSAL HOLDINGS, LLC

13 **ATTESTATION PURSUANT TO LOCAL RULE 5-1(h)(3)**

14 I, Robin E. Devaux, attest that concurrence in the filing of this Joint Case Management
15 Statement and Rule 26(f) Report has been obtained from the signatory, Daniel L. Feder, counsel for
16 Plaintiff. Executed this 6th day of June, 2022 in Alameda, California.

18 /s/ Robin E. Devaux
19 Robin E. Devaux

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

1. The mediation deadline is this Action is reset to be completed by August 18, 2022.

DATED: 6/7/2022

Haywood S. Gill Jr.
JUDGE HAYWOOD S. GILLIAM, JR.