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20 Attorneys for Defendants

21 **UNITED STATES DISTRICT COURT**
 22 **CENTRAL DISTRICT OF CALIFORNIA**

23 DON HENLEY, MIKE CAMPBELL
 and DANNY KORTCHMAR,

24 Plaintiffs,

25 v.

26 CHARLES S. DEVORE and
 JUSTIN HART,

27 Defendants.

Case No. SACV09-0481 JVS (RNBx)

Hon. James V. Selna

**JOINT STIPULATION FOR
 EXTENSION OF TIME TO
 COMPLETE NON-EXPERT
 WITNESS DEPOSITIONS**

28 **AND RELATED COUNTERCLAIMS**

1 WHEREAS, on August 11, 2009, the Court issued the Order for Jury Trial
2 requiring that discovery be completed no later than December 21, 2009;

3 WHEREAS, pursuant to the Court's order, all depositions shall be scheduled
4 to commence no later than December 14, 2009;

5 WHEREAS, due to the varied geographic locations of the witnesses, the
6 schedules of the parties and third-party witnesses, and a conflicting travel
7 obligation of Defendants' counsel in December, the parties are unable to schedule
8 all remaining depositions of non-expert witnesses prior to the December 14
9 deadline;

10 WHEREAS, the parties believe they require a limited extension of time to
11 complete all non-expert witness depositions, without affecting any other deadline
12 established by the Court;

13 WHEREAS, having reviewed the respective schedules of counsel and the
14 remaining witnesses, the parties believe that depositions of non-expert witnesses
15 can be scheduled to commence by January 8, 2010;

16 WHEREAS, the parties have not made any previous requests to extend any
17 discovery deadlines in this action;

18 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by
19 the parties through their undersigned counsel of record that:

- 20 1. The parties may schedule non-expert witness depositions to commence
21 on or before January 8, 2010; and
22 2. No other deadlines in this action will be altered by this stipulation.
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1 Dated: December 3, 2009

MORRISON & FOERSTER LLP
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Paul Goldstein

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By: /s/ Craig B. Whitney
Craig B. Whitney

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Attorneys for Plaintiffs
DON HENLEY, MIKE CAMPBELL and
DANNY KORTCHMAR

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9 Dated: December 3, 2009

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By: /s/ Christopher W. Arledge
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CHARLES S. DEVORE and JUSTIN
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