1 2 3 4 5 6 7 8	Adam R. Fox (State Bar # 220584) <u>afox@ssd.com</u> Anne Choi Goodwin (State Bar # 216244) <u>agoodwin@ssd.com</u> Helen H. Yang (State Bar # 241170) <u>hyang@ssd.com</u> SQUIRE, SANDERS & DEMPSEY L.L.P. 555 South Flower Street, Suite 3100 Los Angeles, CA 90071 Telephone: +1.213.624.2500 Facsimile: +1.213.623.4581 Attorneys for Defendant TRW VEHICLE SAFETY SYSTEMS INC.		
9	UNITED STATES DISTRICT COURT		
10	EASTERN DISTRICT OF CALIFORNIA		
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12	TRACY YU-SANTOS,	Case No. 1:06-cv-01773-AWI-DLB	
13	Plaintiff,		
14	vs.	JOINT STIPULATION REQUESTING CONTINUATION OF TRIAL DATE, PRETRIAL CONFERENCE AND ALL	
15	FORD MOTOR COMPANY, TRW AUTOMOTIVE HOLDINGS CORP.,	CURRENTLY SCHEDULED AND STATUTORILY SCHEDULED DATES	
16	TRW AUTOMOTIVE INC., TRW AUTOMOTIVE U.S. LLC, TRW	FOR SIX WEEKS; ORDER THEREON	
17	VEHICLE SAFETY SYSTEMS INC., ROBERT SANTOS, and DOES 1	Assigned to: Judge: Hon. Anthony W. Ishii	
18	through 10,	Judge. Hon. Hindony W. Iohi	
19	Defendants.		
20			
21	The parties to this action, Plaintiff Tracy Yu-Santos ("Yu-Santos") and Defendant		
22	TRW Vehicle Safety Systems Inc. ("TRW VSSI"), by and through their respective		
23	undersigned counsel, hereby enter into the following stipulation:		
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25	///		
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27	///		
28	///	JOINT STIPULATION REQUESTING	
RS &		CONTINUATION OF TRIAL DATE AND ALL	

WHEREAS, on July 28, 2009, this Court held a Telephonic Scheduling Conference
 in this case, setting the Trial Commencement Date for March 9, 2010 at 9:00 a.m. and the
 Pretrial Conference for January 8, 2010 at 8:30 a.m.;

WHEREAS, TRW VSSI's lead trial counsel in this matter Adam Fox, has requested Plaintiff's counsel's stipulation to a brief adjournment of the trial commencement date because his wife is pregnant and expecting a natural childbirth (and thus, not a scheduled delivery) of their first child on or about February 4, 2010, and Mr. Fox would like to be with his family at the time of the birth and avoid any prolonged separation from them during the first several weeks thereafter, and the distractions attendant to final pretrial preparations;

WHEREAS, Plaintiff has stipulated and agreed to such an adjournment of the
trial commencement date for six (6) weeks, from March 9, 2010 to April 20, 2010, but
would oppose any further or longer continuance than to April 20, 2010;

WHEREAS, a call to the clerk of the Court has indicated the availability of the
Honorable Anthony W. Ishii, United States District Judge, to commence the trial in this
matter on April 20, 2010;

WHEREAS, Plaintiff's lead trial counsel in this matter David Wright is currently
scheduled to commence trial in another case on January 12, 2010 in Phoenix, Arizona,
and upon agreeing to a six-week adjournment of the trial commencement date, made of
Mr. Fox the independent request for a commensurate six week continuance of the
Pretrial Conference from January 8, 2010 to February 19, 2010;

WHEREAS, TRW VSSI has stipulated and agreed to a six-week continuance of the
Pretrial Conference from January 8, 2010 to February 19, 2010.

NOW, THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE, subject
to the approval of the Court, to an adjournment of the trial commencement date
currently scheduled for March 9, 2010 to April 20, 2010, or such other date in between
the two referenced dates as this case may be heard by this Court. The parties also
stipulate to a continuance of the Pretrial Conference such that the Pretrial Conference

1	currently scheduled for January 8, 201	0 is continued to February 19, 2010, or any other	
2		w trial date selected by the Court. The parties	
3	further stipulate that all dates triggered	d thereby, including but not limited to deadlines	
4		TATEMENTS) and all other statutory pretrial	
5	deadlines will be moved accordingly.		
6	IT IS THEREFORE STIPULATED AND AGREED that		
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8	9:00 a.m. to April 20, 2010 at 9:00 a.m., or such other date as is set by this Court;		
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11	date.		
12		is matter, specifically including the deadlines set	
13	13 forth in Rule 281 (PRETRIAL STATEMENTS) and all other statutory pretrial deadlines		
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15	date.		
16	IT IS SO STIPULATED.		
17	Dated: December 16, 2009	SQUIRE, SANDERS & DEMPSEY L.L.P.	
18			
19		By: /s/Adam R. Fox Adam R. Fox	
20		Anne Choi Goodwin Helen H. Yang	
21		Attorneys for Defendant TRW VEHICLE SAFETY SYSTEMS INC.	
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23	Dated: December 16, 2009	MCCUNE & WRIGHT, LLP	
24		By:/s/David C. Wright	
25		David C. Wright Kristy M. Arevalo	
26		Attorneys for Plaintiff TRACY YU-SANTOS	
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28			
SQUIRE, SANDERS & DEMPSEY L.L.P. 555 SO. FLOWER STREET, SUITE 3100 LOS ANGELES, CA 90071-2300		JOINT STIPULATION EXTENDING TIME TO FILE RESPONSIVE PLEADING	

1	9	ORDER
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3	IT IS SO ORDERED.	
4	Dated:	/s/ Dennis L. Beck
5		UNITED STATES MAGISTRATE JUDGE
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ANDERS &		JOINT STIPULATION EXTENDING TIME