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 23 TRW VEHICLE SAFETY SYSTEMS INC.

24
 25 UNITED STATES DISTRICT COURT
 26 EASTERN DISTRICT OF CALIFORNIA

27 TRACY YU-SANTOS,

28 Plaintiff,

vs.

FORD MOTOR COMPANY, TRW
 AUTOMOTIVE HOLDINGS CORP.,
 TRW AUTOMOTIVE INC., TRW
 AUTOMOTIVE U.S. LLC, TRW
 VEHICLE SAFETY SYSTEMS INC.,
 ROBERT SANTOS, and DOES 1
 through 10,

Defendants.

Case No. 1:06-cv-01773-AWI-DLB

**JOINT STIPULATION REQUESTING
 CONTINUATION OF PRETRIAL
 CONFERENCE AND DEADLINE TO
 FILE JOINT PRETRIAL CONFERENCE
 STATEMENT; ORDER THEREON**

Assigned to:
 Judge: Hon. Anthony W. Ishii

1 The parties to this action, Plaintiff Tracy Yu-Santos (“Yu-Santos”) and Defendant
2 TRW Vehicle Safety Systems Inc. (“TRW VSSI”), by and through their respective
3 undersigned counsel, hereby enter into the following stipulation:

4 WHEREAS, on December 18, 2009, this Court entered a Stipulation Requesting
5 Continuation of Trial Date, Pretrial Conference and All Scheduled and Statutorily
6 Scheduled Dates for Six Weeks, pursuant to which the Court continued the Pretrial
7 Conference to February 19, 2010 at 08:30 a.m. and caused the deadline for the Joint
8 Pretrial Conference Statement to move to February 12, 2010.

9 WHEREAS, Plaintiff’s lead trial counsel in this matter David Wright was
10 scheduled to commence trial in another case on January 12, 2010 in Phoenix, Arizona,
11 which did not commence until January 19, 2010 and which ended on January 29, 2010.

12 WHEREAS, since early February 2010, and for the past week, the parties have
13 been working together on a Joint Pretrial Conference Statement. On February 8, 2010,
14 Plaintiff sent TRW VSSI a portion of her Joint Pretrial Conference Statement. However,
15 due to the lengthy number of exhibits that the parties are actively compiling for their
16 respective exhibit lists, and the number of factual and legal issues that the parties have
17 yet to discuss, the parties stipulate to and respectfully request that the Court continue
18 the Pretrial Conference from February 19, 2010 to February 26, 2010 and the deadline to
19 file a Joint Pretrial Conference Statement from February 12, 2010 to February 19, 2010.

20 WHEREAS, this stipulation does not seek to continue the trial commencement
21 date, currently set for April 20, 2010.

22 WHEREAS, a call to the clerk of the Court has indicated that the calendar for the
23 Honorable Anthony W. Ishii, United States District Judge, for February 26, 2010 appears
24 to be clear;

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1 NOW, THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE, subject
2 to the approval of the Court, to a continuance of the Pretrial Conference such that the
3 Pretrial Conference currently scheduled for February 19, 2010 is continued to February
4 26, 2010, or any other such date and time thereafter at the Court's convenience. The
5 parties further stipulate that the deadline to file the Joint Pretrial Conference Statement
6 triggered thereby will be moved accordingly from February 12, 2010 to February 19,
7 2010.

8 IT IS THEREFORE STIPULATED AND AGREED that:

9 1. The Pretrial Conference shall be continued from February 19, 2010 at 8:30
10 a.m. to February 26, 2010 at 8:30 a.m., or any other such date and time thereafter at the
11 Court's convenience.

12 2. The deadline to file the Joint Pretrial Conference Statement shall be
13 continued from February 12, 2010 to February 19, 2010.

14 3. Plaintiff will deliver the remaining portion of her Joint Pretrial Conference
15 Statement to TRW VSSI by February 12, 2010. TRW VSSI will deliver its portion of its
16 Joint Pretrial Conference Statement to Plaintiff by February 17, 2010. The parties will
17 conference on February 18, 2010 to resolve any disputed issues of fact or law and to
18 finalize their Joint Pretrial Conference Statement.

19 **IT IS SO STIPULATED.**

20 [SIGNATURES ON FOLLOWING PAGE]

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1 Dated: February 9, 2010

SQUIRE, SANDERS & DEMPSEY L.L.P.

2

By: /s/ Adam R. Fox

3

Adam R. Fox
Anne Choi Goodwin
Helen H. Yang

4

Attorneys for Defendant
TRW VEHICLE SAFETY SYSTEMS INC.

5

6 Dated: February 9, 2010

MCCUNE & WRIGHT, LLP

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By: /s/ David C. Wright

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David C. Wright
Jae K. Kim

9

Attorneys for Plaintiff
TRACY YU-SANTOS

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ORDER

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IT IS SO ORDERED.

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DATED: February 10, 2010

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 /s/ Anthony W. Ishii

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The Honorable Anthony W. Ishii
UNITED STATES DISTRICT JUDGE

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1 **PROOF OF SERVICE**
2 (Pursuant to Federal Law)

3 The undersigned certifies and declares as follows:

4 I am a resident of the State of California and over 18 years of age and am not a party to
5 this action. My business address is 555 South Flower Street, Suite 3100, Los Angeles, CA
6 90071-2300, which is located in the county where any non-personal service described below took
7 place.

8 On February 10, 2010, a copy of the following document(s):

9 **JOINT STIPULATION REQUESTING CONTINUATION OF PRETRIAL
10 CONFERENCE AND DEADLINE TO FILE JOINT PRETRIAL CONFERENCE
11 STATEMENT; [PROPOSED] ORDER THEREON**

12 **Attorney for Plaintiff**

13 David C. Wright
14 Kristy M. Arevalo
15 McCune & Wright
16 2068 Orange Tree Lane, Suite 216
17 Redlands, CA 92374

18 dcw@mwtriallaw.com
19 kma@mwtriallawyers.com

20 **Via U.S. Mail**

21 ***Robert Santos, Pro Se***
22 Robert Santos
23 2049 65th Avenue
24 Sacramento, CA 95822

25 Service was accomplished as follows.

26 **By U.S. Mail, According to Normal Business Practices.** I am “readily familiar”
27 with the firm’s practice of collection and processing correspondence for mailing. Under that
28 practice the mail would be deposited with U.S. postal service on that same day with postage
thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware
that on motion of the party served, service is presumed invalid if postal cancellation date or
postage meter date is more than one day after date of deposit for mailing in affidavit.

E-MAIL I caused the document(s) to be scanned and E-mailed to David C.
Wright at dcw@mwtriallaw.com and Kristy M. Arevalo at kma@mwtriallawyers.com.

I declare that I am employed in the office of a member of the bar of this court at whose
direction the service was made. Executed on February 10, 2010 at Los Angeles, California.

/s/Consuelo M. Lopez

Consuelo M. Lopez

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