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 AKZO NOBEL PAINTS LLC (erroneously named as “The Glidden Company”).

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11 Attorneys for Plaintiff
 KEVIN R. VAN HORN

12 UNITED STATES DISTRICT COURT
 13 EASTERN DISTRICT OF CALIFORNIA

14 KEVIN R. VAN HORN,)	Case No. 1:09-cv-01040-OWW-GSA
)	
15 Plaintiff,)	STIPULATION TO AMEND EXPERT
)	DISCLOSURE DATES SET FORTH IN
16 v.)	OCTOBER 7, 2009 SCHEDULING
)	CONFERENCE ORDER;
17 THE GLIDDEN COMPANY, a Delaware)	
18 corporation, and DOES 1-20,)	DECLARATION OF LAURA J.
)	MAECHTLEN;
19 Defendants.)	
)	ORDER
20)	
21)	

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STIPULATION TO AMEND EXPERT DISCLOSURE DATES
 Case No. 1:09-cv-01040-OWW-GSA

1 Pursuant to the Court's October 7, 2009 Scheduling Conference Order, and the attached
2 declaration of Laura J. Maechtlen, defendant AKZO NOBEL PAINTS LLC, formerly known as
3 The Glidden Company d/b/a ICI Paints (erroneously named as "The Glidden Company") and
4 Plaintiff KEVIN VAN HORN hereby stipulate to the following amended dates for discovery in
5 this matter. None of the proposed dates will alter the Court's calendar in this matter.

6 **Disclosure of Expert Witnesses: April 15, 2010**

7 **Rebuttal/Supplemental Expert Disclosures: May 14, 2010**

8 **Deadline to complete all discovery: June 15, 2010**

9 DATED: March ____, 2010

SEYFARTH SHAW LLP

10 By: _____/s/

11 Laura J. Maechtlen
12 Attorneys for Defendant
AKZO NOBEL PAINTS LLC.

13 DATED: March ____, 2010

W.J. SMITH & ASSOCIATES

14 By: _____/s/

15 Shelley G. Bryant
16 Attorneys for Plaintiff
17 KEVIN R. VAN HORN.

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DECLARATION OF LAURA J. MAECHTLEN

I, Laura J. Maechtlen, declare as follows:

1. I am a partner with the law firm Seyfarth Shaw LLP, counsel of record for Defendant. I am licensed to practice law in California, am a member in good standing of the California State Bar and am admitted to practice before the U.S. District Court, Eastern District of California. I have personal knowledge of the facts stated herein, and if called to testify, I could and would testify competently thereto.

2. The parties have met and conferred regarding the date for Plaintiff's deposition. The parties have agreed to April 1, 2010, however the deadline for disclosure of expert witnesses is currently April 1, 2010. Defendant requires the completion of Plaintiff's deposition prior to expert disclosures and, in turn, a short extension of time to ensure completion of the disclosure of rebuttal or supplemental experts, and expert witness designations. Plaintiff does not disagree.

3. The dates proposed in the parties Stipulation To Amend Discovery Dates will not alter the Court's calendar, as they do not seek alternative dates for court appearances or hearing dates. The parties request only a short 2-week continuance for certain discovery dates, to accommodate the parties schedules.

4. The parties are continuing to engage in informal settlement negotiations and have proposed mediation. The parties hope to participate in a mediation in the first week of April 2010. A short continuance of certain dates will allow the parties to conduct mediation prior to the deadline for expert discovery, which may allow the parties to direct resources toward mediation, instead of expert disclosures.

I declare under penalty of perjury under the laws of the State of California that the forgoing is true and correct. Executed this 2nd day of March 2010 at San Francisco, California.

Laura J. Maechtlen

