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7 GLOBAL CREDIT & COLLECTION CORP.

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10 UNITED STATES DISTRICT COURT
11 FOR THE EASTERN DISTRICT OF CALIFORNIA

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LAURA TONARELLI, an individual,) CASE NO. 1:10-cv-00309-OWW-DLB
v.) District Judge: Hon. Oliver W. Wanger
GLOBAL INTERNATIONAL, INC. d/b/a) Magistrate Judge: Hon. Dennis L. Beck
GLOBAL CREDIT & COLLECTION,)
CORP.; and DOES 1 through 10,)
inclusive)
Defendant.)

TO THE HONORABLE COURT AND TO ALL PARTIES:
IT IS HEREBY STIPULATED between Defendant GLOBAL CREDIT &
COLLECTION, CORP. ("Defendant") and Plaintiff LAURA TONARELLI ("Plaintiff"), through
their respective counsel of record, as follows:
1. WHEREAS, on July 2, 2010, this Court entered its Scheduling Order. The
discovery cut-off set forth therein was **January 31, 2011**.
2. WHEREAS, the parties have timely served written discovery upon each other
before the discovery cut-off.
3. WHEREAS the depositions of Plaintiff and Defendant's designated representative

STIPULATION AND ORDER FOR EXTENSION OF DISCOVERY CUT-OFF

1 are currently scheduled for before the discovery cut-off.

2 4. WHEREAS the parties agree that the depositions of Plaintiff and Defendant's
3 designated representative may provide sufficient information to facilitate settlement. However, the
4 parties agree that discovery in this case may require depositions of multiple various third party
5 witnesses to the events alleged in Plaintiff's Complaint.

6 5. WHEREAS, the majority of these contemplated third party depositions will not be
7 able to be scheduled before the current discovery cut-off.

8 6. WHEREAS, in light of the attorney fee provision in the Fair Debt Collection
9 Practices Act ("FDCPA") as alleged in Plaintiff's Complaint, if the parties are forced to take these
10 third party depositions prematurely in order to avoid the discovery cut-off, the parties will incur
11 substantial litigation expenses, and the costs of discovery will make it prohibitive for the parties to
12 settle after that time.

13 7. WHEREAS, pursuant to foregoing and below, and in the Declaration of David J.
14 Kaminski filed concurrently herewith, good cause has been shown, the parties respectfully request
15 that this Court continue the discovery cut-off for a period of approximately sixty (60) days up to
16 **March 31, 2011.**

17 8. WHEREAS, trial in this case is set for June 21, 2011.

18 9. WHEREAS, this is the *first request* for an extension of time by any party to this
19 case. This request for an extension is not to cause any delay but to facilitate the resolution of this
20 case by settlement before exorbitant attorneys fees and costs are incurred by the parties which will
21 hinder settlement negotiations.

22 Respectfully submitted,

24 DATED: January 3, 2011

CARLSON & MESSER LLP

25 By /s/ David J. Kaminski
26 David J. Kaminski
27 Stephen A. Watkins
28 Attorneys for Defendant,
 GLOBAL CREDIT & COLLECTION, CORP.

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1 DATED: January 3, 2011

GOLDEN & CARDONA-LOYA, LLP

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3 By /s/ Jeremy Golden
4 Jeremy Golden
5 Attorneys for Plaintiff
LAURA TONARELLI

6 ORDER

7 Pursuant to the Stipulation of the parties and good cause appearing therefor, it is hereby ordered
8 that:

9 The discovery cut-off is extended up to March 31, 2011.

10 IT IS SO ORDERED.

11 Dated: January 3, 2011

12 /s/ Oliver W. Wanger
UNITED STATES DISTRICT JUDGE

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