

1 Janine S. Simerly (SBN 102361)
jss@millerlawgroup.com
 2 Alexander C. Miller (SBN 252483)
acm@millerlawgroup.com
 3 MILLER LAW GROUP
 A Professional Corporation
 4 111 Sutter Street, Suite 700
 San Francisco, CA 94104
 5 Tel. (415) 464-4300
 Fax (415) 464-4336
 6
 Attorneys for Defendant
 7 RYDER INTEGRATED LOGISTICS, INC.

8 Robin K. Perkins (SBN 131252)
rperkins@perkins-lawoffice.com
 9 Perkins & Associates
 300 Capitol Mall, Suite 1800
 10 Sacramento, CA 95814
 Tel. (916) 446-2000
 11 Fax (916) 447-6400

12 Attorneys for Plaintiff
 RAY RHEAD

MILLER LAW GROUP
 A PROFESSIONAL CORPORATION
 SAN FRANCISCO, CALIFORNIA

15 **UNITED STATES DISTRICT COURT**
 16 **EASTERN DISTRICT OF CALIFORNIA**

18 RAY RHEAD,

19 Plaintiff,

20 v.

22 RYDER INTEGRATED LOGISTICS, INC., a
 Delaware Corporation doing business in
 23 California; and DOES 1 through 30, inclusive

24 Defendant(s).

Case No.: 2:09-CV-00705-MCE-GGH

**STIPULATION AND ORDER TO EXTEND
 NON-EXPERT DISCOVERY DEADLINE**

Complaint filed: January 23, 2009

Trial Date: March 28, 2011

1 WHEREAS, in the Pretrial Scheduling Order filed in this matter on May 26,
2 2009, the Honorable Morrison C. England ordered the Plaintiff RAY RHEAD and Defendant
3 RYDER INTEGRATED LOGISTICS, INC. (“the parties”) to complete all discovery, with the
4 exception of expert discovery, by May 28, 2010 (Court Docket No. 9);

5
6 WHEREAS, Defendant began Plaintiff’s deposition on April 14, 2010, but was
7 unable to finish it at that time;

8
9 WHEREAS, lead defense counsel Janine S. Simerly will be in trial in the
10 matter of *Veronese v. Lucasfilm, LTD*, Superior Court of California, County of Marin, Case
11 No. CIV 091548, beginning on May 7, 2010 for an estimated four to six weeks;

12
13 WHEREAS, Ms. Simerly will be unavailable to complete Plaintiff’s deposition
14 until after this other trial has completed;

15
16 WHEREAS, Plaintiff wishes to take the deposition of two individuals who are
17 former employees of Defendant;

18
19 WHEREAS, the parties are still attempting to locate one or more of these
20 unaffiliated witnesses so that Plaintiff may complete their depositions;

21
22 WHEREAS, the parties and their counsel request that the May 28, 2010 non-
23 expert discovery deadline be vacated, and be continued to July 28, 2010;

24
25 IT IS HEREBY STIPULATED by and between the parties, through their
26 respective counsel, that non-expert discovery deadline be vacated, and be continued to July
27 28, 2010.

