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19 SYCAMORE PARTNERS, LLC

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

17 BRYON CHAPMAN,
18 Plaintiff,

19 v.

20 STARBUCKS CORPORATION dba
21 STARBUCKS COFFEE #5740;
22 SYCAMORE PARTNERS, LLC,

23 Defendants.

CASE NO.: 2:09-CV-02526-GEB-EFB

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE THE
REBUTTAL EXPERT DISCLOSURE
AS TO DEFENDANT SYCAMORE
PARTNERS, LLC**

24 Plaintiff, BYRON CHAPMAN (“Plaintiff”) and Defendant, SYCAMORE
25 PARTNERS, LLC (“SYCAMORE”), by and through their respective counsel, hereby
26 jointly stipulate and request that the Court grant a continuance of the rebuttal expert
27 witness disclosure deadline (June 21, 2010) for SYCAMORE based on the following
28 good cause:

1 1. Plaintiff filed his action seeking renovations to the STARBUCKS in
2 Woodland, California to improve disabled access, as well as seeking damages and
3 attorney's fees, litigation expenses, and costs.

4 2. SYCAMORE has informally provided Plaintiff with photographs of the
5 accessible parking spaces, signage and access aisle immediately in front of the
6 STARBUCKS in question. Plaintiff has reviewed the photographs and responded with
7 various concerns, and SYCAMORE is diligently working with Plaintiff's counsel to
8 address these concerns.

9 3. While the parties have been cooperating in good faith to resolve this
10 matter, the rebuttal exchange date currently looms at June 21, 2010. Forcing
11 SYCAMORE to have its rebuttal expert finalize his opinions and issue a report at this
12 time would significantly increase the cost of the case without increasing the likelihood
13 of settlement, which the parties anticipate conducting in the absence of formal discovery
14 procedures.

15 4. The parties therefore jointly request that the Court grant a continuance of
16 the rebuttal expert witness disclosure deadline from June 21, 2010 to July 31, 2010 for
17 SYCAMORE to allow the parties an opportunity to negotiate resolution of Plaintiff's
18 claims before launching into full discovery and motion practice.

19 5. A continuance of SYCAMORE'S rebuttal expert witness disclosure will
20 not affect any of the other deadlines in this case as the discovery cut-off is not until
21 October 20, 2010, and the last day to hear motions is December 20, 2010. Trial of this
22 matter is not until May 17, 2011.

23 **IT IS HEREBY STIPULATED** as follows:

24 1. That the rebuttal expert witness disclosure deadline be moved from June
25 21, 2010 to July 31, 2010 as to SYCAMORE. All other previously scheduled dates in
26 this matter are to remain unchanged, except as to the outstanding written discovery
27 deadlines which are also extended to July 31, 2010.

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SO STIPULATED:

DATED: June 21, 2010

DISABLED ADVOCACY GROUP, APLC

By: /s/ Lynn Hubbard, III (as authorized on 6/21/10)

LYNN HUBBARD, III
SCOTTLYNN J. HUBBARD, IV
Attorney for Plaintiff
BRYON CHAPMAN

DATED: June 17 2010

GREENBERG TRAUIG, LLP

By: /s/ Kathleen E. Finnerty

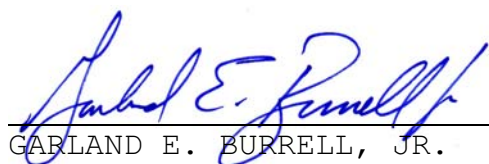
KATHLEEN E. FINNERTY
Attorney for Defendant
SYCAMORE PARTNERS, LLC

ORDER

IT IS SO ORDERED.

The rebuttal expert witness disclosure date as to SYCAMORE is continued to July 31, 2010, and all remaining pretrial and trial dates in this matter are unchanged.

DATED: June 22, 2010



GARLAND E. BURRELL, JR.
United States District Judge