

1 Mark S. Spring, State Bar No. 155114
 Jane Harrington, State Bar No. 252109
 2 CARLTON DiSANTE & FREUDENBERGER LLP
 8950 Cal Center Drive
 3 Suite 160
 Sacramento, California 95826
 4 Telephone: (916) 361-0991
 Facsimile: (916) 361-1480
 5 E-Mail: mspring@cdflaborlaw.com
 jharrington@cdflaborlaw.com

6 Attorneys for Defendants
 7 FEDEX FREIGHT, INC. and FEDEX CORPORATION

8 **UNITED STATES DISTRICT COURT**
 9 **EASTERN DISTRICT OF CALIFORNIA**

11 ALVIN BROWN, ROBERT CHAKRIN,)	Case No. 2:10-cv-02493-FCD-KJM
KENNETH DAMON VAN METER, WALTER)	
12 WILLIAMS, and MATIAS C. ZAVALA,)	STIPULATION AND ORDER TO
)	EXTEND TIME FOR RULE 26 STATUS
13 Plaintiffs,)	CONFERENCE AND FOR EXCHANGE
v.)	OF INITIAL DISCLOSURES
)	
14 FEDEX FREIGHT, INC., an Arkansas)	STATUS CONFERENCE STATEMENT
15 corporation;)	DUE
FEDEX CORPORATION, a Delaware)	Date: November 15, 2010
16 corporation; and,)	
DOES 1 through 20, Inclusive,)	[PROPOSED] CONTINUED DATE
)	Date: December 15, 2010
17 Defendants.)	
)	

18 **STIPULATION**

19
 20 The Parties hereby stipulate to an extension of time for the filing of the Joint Status
 21 Conference Statement and for exchange of Initial Disclosures pursuant to Rule 26.

22 The Joint Status Conference Statement is currently due November 15, 2010. The Parties set
 23 their meeting for the purposes of preparing the Joint Status Conference Statement for November 3,
 24 2010.

25 However, a substitution of counsel for Defendants in this case was filed on October 25,
 26 2010. Previous counsel for Defendants at Gordon & Rees left private practice.

27 Mark Spring, new lead counsel for Defendants, was scheduled to begin a one-month jury
 28 trial October 26, 2010 in Department 39 in Sacramento County Superior Court. Jane Harrington,

1 also counsel for Defendants, was previously scheduled to be out of state November 1-7, 2010, and
2 thus also unavailable to meet on November 3, 2010. Counsel just received the voluminous case file
3 on October 26, 2010 and has not had time to adequately review the case to determine the issues that
4 need to be addressed at the Initial Case Management Conference.

5 For these reasons, the Parties have conferred and stipulated to extending the time by four
6 weeks for the filing of the Joint Status Conference Statement and exchange of Initial Disclosures.
7 The Parties stipulate that the last date for filing of the Joint Status Conference Statement and for the
8 exchange of Initial Disclosures be continued to December 15, 2010.

9
10 IT IS SO STIPULATED.

11 Dated: October _____, 2010 CARLTON DiSANTE & FREUDENBERGER LLP

12
13 By: /s/ _____

14 Jane Harrington

15 Attorneys for Defendant
16 FEDEX FREIGHT, INC.
17 FEDEX CORPORATION

18
19 Dated: October _____, 2010 LINDA J. SLOVAN
20 ATTORNEY AT LAW

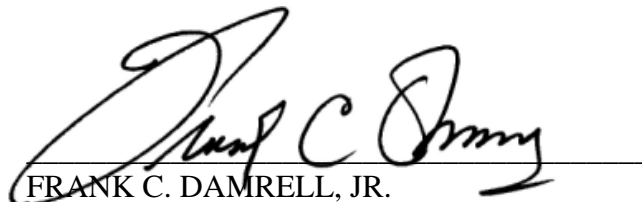
21
22 By: /s/ _____

23 Linda J. Sloven

24 Attorneys for Plaintiffs
25 ALVIN BROWN
26 ROBERT CHAKRIN
27 KENNETH DAMON VAN METER
28 WALTER WILLIAMS
MATIAS C. ZAVALA

29 IT IS SO ORDERED:

30 Dated: October 28, 2010

31
32 
33 FRANK C. DAMRELL, JR.
34 UNITED STATES DISTRICT JUDGE