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17 UNITED STATES DISTRICT COURT  
 18 NORTHERN DISTRICT OF CALIFORNIA

20 PAUL A. REDD, JR.,  
 21  
 22 Plaintiff,  
 23 vs.  
 24 MICHAEL D. DALEY,  
 25  
 26 Defendant.

No. C 98-20429 EMC

**JOINT STIPULATION AND ~~PROPOSED~~  
 ORDER TO CONTINUE DISCOVERY  
 CUT OFF DATES**

1 **JOINT STIPULATION**

2 Pursuant to Local Rule 6-2, Plaintiff Paul A. Redd, Jr. and Defendant Michael D. Daley, by and  
3 through their respective counsel of record, hereby jointly stipulate and respectfully request the Court  
4 enter an order as follows:

5 1. On October 20, 2014, the Court issued its Case Management and Pretrial Order for Jury  
6 Trial (ECF 234). In the Order, the Court set the following discovery deadlines:

- 7 • Non-expert discovery cut off: December 4, 2014  
8 • Opening expert reports: December 4, 2014  
9 • Rebuttal expert reports: December 26, 2014  
10 • Expert discovery cut off: January 15, 2015

11 2. Since the Court's order, the parties have engaged in discussions regarding settlement of  
12 Plaintiff's claims and scheduling discovery so as not to prejudice their direct settlement discussions.

13 3. Accordingly, in order for the parties to explore fully the possibility of settlement of this  
14 action, the parties' respectfully request that the Court continue the discovery deadlines as follows:

- 15 • Non-expert discovery cut off: February 2, 2015  
16 • Opening expert reports: February 2, 2015  
17 • Rebuttal expert reports: February 23, 2015  
18 • Expert discovery cut off: March 9, 2015

19 4. The filing of this stipulation does not affect the other case management deadline set by  
20 the Court in the October 20, 2014, Order, including the trial and pre-trial dates.

21 Dated: November 24, 2014

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24  
25 Dated: November 24, 2014

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