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4 Attorneys for Plaintiff  
 5 JORGE ANGULO

6  
 7 IN THE UNITED STATES DISTRICT COURT  
 8 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 9 SAN FRANCISCO DIVISION

10 JORGE ANGULO, an individual,  
 11 Plaintiff,

12 v.

13 MATHESON POSTAL SERVICES, a California  
 Corporation, MARCOS BARRAGAN, and  
 14 DOES 1-25 inclusive,

15 Defendants.

) Case No. C08-00146 BZ

) **STIPULATION AND ORDER TO**  
 ) **CONTINUE THE DEADLINES FOR**  
 ) **NON-EXPERT DISCOVERY AND**  
 ) **DISPOSITIVE MOTIONS**

) Date:  
 ) Time:

) Hon. Bernard Zimmerman

TENAX LAW GROUP, PC

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 18 Pursuant to Civil L.R. 7-12, the parties, through their undersigned counsel, stipulate as  
 19 follows:

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 21 1. By Order of the court, dated August 28, 2008, the Parties to this action were  
 22 required to complete Non-expert Discovery by October 1, 2008. Furthermore, that same order set  
 23 the deadline for hearing Dispositive Motions as November 25, 2008. Due to scheduling conflicts  
 24 and attempts to resolve this matter without the need for further litigation, the Parties require  
 25 additional time to complete discovery in this matter. The parties have participated in an Early  
 26 Neutral Evaluation, conducted by John Beers, Esq. Pursuant to the ENE, it is believed by the  
 27 parties, counsel and evaluator that the case has a much improved chance of settling; however, the  
 28 key deadlines (and necessarily the trial date) need to be continued in order to eliminate the need  
 for unnecessary attorneys' fees and costs which would detract from the potential for a settlement.

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2. The Parties Stipulate and Agree that an extension of the deadline for Non-Expert Discovery to December 31, 2008 and an extension of the deadline for Dispositive Motions to February 27, 2009 will permit them the appropriate time to attempt complete discovery and obtain a resolution by way of a settlement of this matter without the need for trial.

3. Accordingly, the Parties jointly request the Court enter an Order setting the following deadlines and a new trial date:

Completion of Non-expert Discover by December 31, 2008

Last day for hearing Dispositive Motions, February 27, 2009

New trial date: Soonest date available after May 1, 2009

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

By: /s/ Aaron Roblan  
Aaron Roblan

Attorneys for Defendants  
MARCO BARRAGAN and MATHESON  
POSTAL SERVICES, INC.

TENAX LAW GROUP

By: /s/ Christopher Arras  
Christopher Arras

Attorneys for the Plaintiff JORGE ANGULO

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Last day to hear Dispositive Motions: March 4, 2009

Trial date will be set on March 4, if necessary

Date: November 7, 2008

  
Hon. Bernard Zimmerman