

1 SQUIRE, SANDERS & DEMPSEY L.L.P.  
 2 Michelle M. Full (State Bar # 240973)  
 3 One Maritime Plaza, Suite 300  
 4 San Francisco, CA 94111-3492  
 Telephone: +1.415.954.0200  
 Facsimile: +1.415.393.9887  
[mfull@ssd.com](mailto:mfull@ssd.com)

5 Robert C.L. Vaughan, Esq. (Admitted Pro Hac Vice)  
 6 Mia Burroughs Fraser, Esq. (Admitted Pro Hac Vice)  
 7 200 South Biscayne Blvd., Suite 4000  
 8 Miami, Florida 33131  
 Telephone: (305) 577-7000  
 Facsimile: (305) 577-7001  
[rvaughan@ssd.com](mailto:rvaughan@ssd.com)  
[mburroughs@ssd.com](mailto:mburroughs@ssd.com)

9  
 10 Attorneys for Defendant  
 11 MERLE SCOTT

12 UNITED STATES DISTRICT COURT  
 13 NORTHERN DISTRICT OF CALIFORNIA  
 14 (SAN FRANCISCO DIVISION)

15 BILL A. DUFFY, INC., a California  
 16 corporation d/b/a BDA SPORTS  
 MANAGEMENT,

17 Plaintiff,

18 vs.

19 MERLE SCOTT,

20 Defendant.

Case No. 3:08-cv-00878-EDL

**[E-Filing]**

**STIPULATED REQUEST FOR ORDER  
 CHANGING EXPERT DISCOVERY  
 DEADLINES AND [~~PROPOSED~~] ORDER**

21  
 22  
 23  
 24  
 25  
 26  
 27  
 28  
 PARTIES' STIPULATED REQUEST FOR ORDER  
 CHANGING EXPERT DISCOVERY DEADLINES &  
 [~~PROPOSED~~] ORDER - 3:08-00878

1 Plaintiff, Bill A. Duffy, Inc. (“Duffy”) and Defendant, Merle Scott (“Scott”) (collectively  
2 the “Parties”), in accordance with Local Rule 6-2 and this Court’s December 19, 2008 Order Dkt.  
3 No. 64, respectfully moves this Court for an order changing expert discovery deadlines outlined  
4 in the Court’s Order Following Further Case Management Conference. Dkt. No. 57. Specifically,  
5 the parties request that the time for initial expert disclosures be extended up through and  
6 including February 16, 2009; the time for rebuttal expert disclosures be extended up through  
7 including February 23, 2009; and that the overall deadline for expert discovery be extended up  
8 through and including March 17, 2009. A declaration in support of this motion is attached hereto  
9 as Exhibit A.

10  
11 Dated: January 13, 2009.

Respectfully submitted,

SQUIRE, SANDERS & DEMPSEY L.L.P.

12  
13  
14 By: /s/ Mia B. Fraser  
Mia B. Fraser, Esq.

15  
16 *Attorneys for Defendant*  
MERLE SCOTT

17 Robert C.L. Vaughan, Esq.  
Mia B. Fraser, Esq.  
SQUIRE, SANDERS AND DEMPSEY L.L.P.  
200 South Biscayne Blvd., Suite 4000  
Miami, Florida 33131  
[rvaughan@ssd.com](mailto:rvaughan@ssd.com)  
[mburroughs@ssd.com](mailto:mburroughs@ssd.com)  
Telephone: (305) 577-7000  
Facsimile: (305) 577-7001  
*Admitted Pro Hac Vice in the Northern District  
of California*

23 Michelle M. Full (State Bar # 240973)  
SQUIRE, SANDERS & DEMPSEY L.L.P.  
One Maritime Plaza, Suite 300  
San Francisco, CA 94111-3492  
Telephone: +1.415.954.0200  
Facsimile: +1.415.393.9887  
[mfull@ssd.com](mailto:mfull@ssd.com)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: January 13, 2009

BROWN, HALL, SHORE & MCKINLEY

By: /s/ John R. Conger

John R. Conger, Esq. (State Bar # 168114)  
Bill J. Kuenzinger, Esq. (State Bar # 159168)  
3031 West March Lane, Suite 230 W  
Stockton, CA 95219-6500  
[jconger@bhsrmck.com](mailto:jconger@bhsrmck.com)  
[bkuenzinger@bhsrmck.com](mailto:bkuenzinger@bhsrmck.com)  
Telephone: (209) 477-8171  
Facsimile: (209) 477-2549

*Attorneys for Plaintiff*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**[PROPOSED] ORDER**

The Parties' Stipulated Request for Court Order Changing Expert Discovery Deadlines is GRANTED. The Discovery deadlines set by the Court are modified as follows: initial expert disclosures shall be made no later than February 16, 2009; rebuttal expert disclosures shall be made no later than February 23, 2009; and all expert discovery shall be completed no later than March 17, 2009. Absent good cause, no other pretrial or trial dates will be continued.

IT IS SO ORDERED.

Dated: January 13, 2009.

