

SHARTSIS FRIESE LLP
ONE MARITIME PLAZA
EIGHTEENTH FLOOR
SAN FRANCISCO, CA 9 4111

1 SHARTSIS FRIESE LLP
FRANK A. CIALONE (Bar #172816)
2 LISA A. JACOBS (Bar #230364)
One Maritime Plaza, Eighteenth Floor
3 San Francisco, CA 94111
Telephone: (415) 421-6500
4 Facsimile: (415) 421-2922
Email: fcialone@sflaw.com; ljacobs@sflaw.com

5 Attorneys for Plaintiff
6 SHARTSIS FRIESE LLP

7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 SHARTSIS FRIESE LLP,
12 Plaintiff,

13 v.

14 JP MORGAN RETIREMENT SERVICES,
15 LLC dba JP MORGAN COMPENSATION
AND BENEFIT STRATEGIES as Successor
16 in Interest of CCA STRATEGIES LLC and
CHICAGO CONSULTING ACTUARIES,
17 LLC and DOES 1-10,

18 Defendants.

Case No. CV 08-1064 (SC)

**STIPULATION AND [PROPOSED]
ORDER AMENDING AUGUST 15,
2008 SCHEDULING ORDER**

Courtroom: 1, 17th Floor
Judge: Hon. Samuel Conti
Complaint Filed: January 24, 2008
Trial Date: June 8, 2009

19 WHEREAS, the Court, on August 15, 2008, entered a status conference order setting the
20 times for compliance with certain rules of court (the "Scheduling Order"), including that all
21 discovery be completed and all depositions be taken by April 8, 2009; and

22 WHEREAS, the parties, plaintiff Shartsis Friese LLP and Defendants JP Morgan Chase &
23 Co. and JP Morgan Retirement Services LLC d/b/a JP Morgan Compensation and Benefit
24 Strategies, wish to modify the Scheduling Order with respect to expert witness discovery;

25 THE PARTIES HEREBY STIPULATE to and request that the Court amend its
26 Scheduling Order as follows:

- 27 1. Expert Witness Disclosures be exchanged on April 8, 2009;

28

Case No.:
CV 08-1064 (SC)

STIPULATION AND [PROPOSED] ORDER
AMENDING AUGUST 15, 2008 SCHEDULING ORDER

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

2. Rebuttal Expert Witness Disclosures be exchanged on April 29, 2009; and
3. Expert Witness Depositions be completed by May 15, 2009.

DATED: March __, 2009

SHARTSIS FRIESE LLP

By: s/Frank A. Cialone
FRANK A. CIALONE
Attorneys for Plaintiff
SHARTSIS FRIESE LLP

DATED: March __, 2009

KLINEDINST PC

By: s/Connie M. Anderson
JOHN D. KLINEDINST
CONNIE M. ANDERSON
Attorneys for Defendant
JP MORGAN RETIREMENT SERVICES,
LLC DBA JP MORGAN COMPENSATION
AND BENEFIT STRATEGIES, as successors
in interest to CCA STRATEGIES LLC, AND
CHICAGO ACTUARIES, LLC

ORDER

Pursuant to the Stipulation, above, and good cause appearing therefore,

IT IS HEREBY ORDERED that the August 15, 2008 Scheduling Order be modified as follows:

1. Expert Witness Disclosures be exchanged on April 8, 2009;
2. Rebuttal Expert Witness Disclosures be exchanged on April 29, 2009; and
3. Expert Witness Depositions be completed by May 15, 2009.

DATED: March 5, 2009.

By _____

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
JUDGE

