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15 Attorneys for Defendants
 16 CHEVRON ENERGY TECHNOLOGY
 COMPANY AND JIM EVERARD

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA

19
 20 STEPHEN VALLIMONT,

Case No. C 08-01227 JSW

21 Plaintiff,

STIPULATION AND ~~[PROPOSED]~~
 ORDER CONTINUING CLOSE
 OF NON-EXPERT AND EXPERT
 DISCOVERY

22 v.

23 CHEVRON RESEARCH & TECHNOLOGY
 24 and JIM EVERARD,

Trial Date: June 15, 2009

25 Defendants.
 26 _____/

27 The parties, Plaintiff STEPHEN VALLIMONT ("Plaintiff") and Defendant CHEVRON
 28 RESEARCH & TECHNOLOGY ("Defendant"), do by and through their respective counsel,
 STIPULATION AND ~~[PROPOSED]~~ ORDER CONTINUING CLOSE OF NON-EXPERT AND EXPERT DISCOVERY

1 stipulate and agree that the non-expert discovery in this matter, which is now scheduled to close
2 on January 12, 2009 per the Court's July 22, 2008 Order Scheduling Trial and Pretrial Matters,
3 should be continued to March 2, 2009, which is approximately forty-five (45) days during
4 which additional depositions need to be taken in this matter.
5

6 Both parties also stipulate that other deadlines related to the close of non-expert discovery
7 be continued similarly. Specifically, (i) the deadline to serve and file a certification that all
8 supplementation has been completed would be continued to January 29, 2009; (ii) the deadline
9 for any motions to compel would be continued to March 9, 2009 based on Local Rule 26-2; (iii)
10 the deadline to complete mediation would be continued to March 2, 2009; and (iv) the last day
11 for expert discovery would be continued to April 30, 2008 with the parties to disclose their
12 respective experts according to Federal Rule of Civil Procedure 26(a)(2)(C).
13

14 The parties make this request for good cause, including because (1) several witnesses
15 whose depositions have been noticed will not be taken until January 2009; (2) several witness
16 depositions have yet to be scheduled; (3) Plaintiff cannot adequately assess the need to take two
17 witnesses' depositions, Ms. Juli Moore and Ms. Cynthia Bozman, until after other depositions
18 have been concluded; (4) Defendant is not voluntarily producing witnesses for deposition but
19 instead, is requiring Plaintiff subpoena their deposition testimony though they remain employed
20 with Defendant; (5) Plaintiff and Defendant are meeting and conferring on outstanding
21 depositions; (6) Plaintiff will likely need to file motions to compel other testimony; and (7) if
22 needed, Plaintiff requires time to propound follow-up discovery requests based upon deposition
23 testimony.
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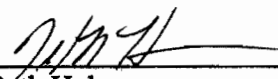
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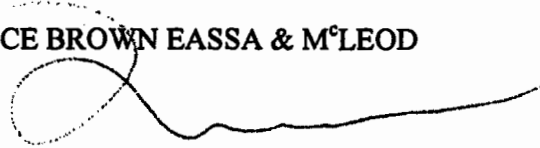
Dated: December 22 2008

HUBER LAW FIRM

By: 
Beth Huber
Attorneys for Plaintiff,
STEPHEN VALLIMONT

Dated: December 22 2008

FILICE BROWN EASSA & M^cLEOD

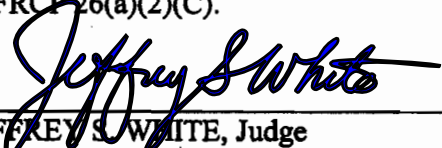
By: 
Robert D. Eassa
Delia A. Isvoranu
Attorneys for Defendants,
CHEVRON RESEARCH & TECHNOLOGY
and JIM EVERARD

PROPOSED ORDER

After reviewing the parties' stipulation and good cause appearing therefore,

IT IS HEREBY ORDERED that the close of non-expert discovery in this matter is continued from January 12, 2009 until March 2, 2009; the deadline to serve and file a certification that all supplementation has been completed is continued to January 29, 2009; the joint letter pursuant to the Court's standing orders deadline to file a ~~motion to compel~~ is continued to March 9, 2009; the deadline to complete mediation is continued to March 2, 2009; the last day for expert discovery is continued to April 30, 2008 with disclosure occurring pursuant to FRCP 26(a)(2)(C).

DATED: December 23, 2008


JEFFREY S. WHITE, Judge
United States District Court