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24 STEPHEN VALLIMONT

25 **UNITED STATES DISTRICT COURT**
26 **NORTHERN DISTRICT OF CALIFORNIA**

27 **STEPHEN VALLIMONT,**

Case No. C 08-01227 JSW

28 **Plaintiff,**

**STIPULATION AND ~~[PROPOSED]~~
ORDER CONTINUING DATE
FOR FILING & HEARING
DISPOSITIVE MOTIONS**

v.

29 **CHEVRON RESEARCH & TECHNOLOGY**
30 **and JIM EVERARD,**

Trial Date: June 15, 2009

31 **Defendants.**

32 _____ /
33 ~~STIPULATION AND [PROPOSED] ORDER CONTINUING DATES FOR FILING AND HEARING DISPOSITIVE MOTIONS~~

1 On December 23, 2008, the Court entered (pursuant to the parties' stipulation) an Order
2 extending non-expert discovery in this matter from January 12, 2009 to March 2, 2009. The
3 Order also similarly continued other deadlines including (i) the deadline to serve and file a
4 certification that all supplementation has been completed; (ii) the deadline for any motions to
5 compel; (iii) the deadline to complete mediation; and (iv) the last day for expert disclosure and
6 discovery.

7 The parties, Plaintiff STEPHEN VALLIMONT ("Plaintiff") and Defendant CHEVRON
8 RESEARCH & TECHNOLOGY ("Defendant"), do by and through their respective counsel,
9 also stipulate and agree that the February 13, 2009 deadline for filing dispositive motions be
10 continued—as a result of the extended discovery period—to March 13, 2009, and that the Court
11 schedule said motion to be heard on April 15, 2009.

12 Good cause exists, including that discovery has been extended and, therefore, should be
13 completed prior to the filing of any dispositive motions. The requested continuance correlates
14 to the recent continuance of the discovery cut-off dates and is reasonable as only a one month
15 continuance of the dispositive motion dates is sought.

16 Dated: January 30, 2009

17 FILICE BROWN EASSA & M^cLEOD

18
19 By: _____/s/_____
20 Robert D. Eassa
21 Delia A. Isvoranu
22 Attorneys for Defendants,

23 Dated: January 30, 2009

HUBER LAW FIRM

24
25 By: _____/s/_____
26 Beth Huber
27 Attorneys for Plaintiff
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PROPOSED ORDER

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

IT IS HEREBY ORDERED that the date by which all dispositive motions must be filed in this matter is continued from February 13, 2009 until March 13, 2009, and such motion(s) shall be heard on ~~April 15, 2009~~, in this department at 9:00 a.m.

April 24, 2009

DATED: January 30, 2009



HON. JEFFREY S. WHITE
United States District Court