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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**

20 **STEPHEN VALLIMONT,**

**Case No. C 08-01227 JSW**

21 **Plaintiff,**

**STIPULATION AND ~~[PROPOSED]~~  
ORDER CONTINUING DEADLINE  
TO FILE MOTION TO COMPEL;  
MEDIATION**

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 DEADLINE TO FILE MOTION TO COMPEL; MEDIATION, 1

1 stipulate and agree the deadline for any motions to compel would be continued to March 17,  
2 2009 based on Local Rule 26-2; (iii) the deadline to complete mediation would be continued to  
3 April 17, 2009.

4 The parties make this request for good cause, including because (1) the parties have met  
5 and conferred and Defendant has agreed to supplement its responses to Plaintiff's first set of  
6 written discovery with said supplementation to occur on or about March 10, 2009; (2) the  
7 parties prefer to consolidate all outstanding discovery issues to the Court in one letter motion  
8 instead of filing multiple letter motions with the Court; and (3) the parties are just completing  
9 witness depositions in this matter with at least one to be taken at an unknown time due to health  
10 concerns of the witness and (4) Plaintiff and Defendant are meeting and conferring on  
11 Plaintiff's second set of written discovery.  
12  
13

14 Dated: March 9, 2009

HUBER LAW FIRM

15  
16 By: \_\_\_\_\_/s/\_\_\_\_\_  
17 Beth Huber  
18 Attorneys for Plaintiff,  
STEPHEN VALLIMONT

19 Dated: March 9, 2009

FILICE BROWN EASSA & M<sup>c</sup>LEOD

20  
21 By: \_\_\_\_\_/s/\_\_\_\_\_  
22 Robert D. Eassa  
23 Delia A. Isvoranu  
24 Attorneys for Defendants,  
CHEVRON RESEARCH & TECHNOLOGY  
and JIM EVERARD

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~~**PROPOSED**~~ **ORDER**

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

discovery disputes

**IT IS HEREBY ORDERED** that the deadline to file a ~~motion to compel~~ is continued to

March 17, 2009 and the deadline to complete mediation is continued to April 17, 2009.

DATED: March 9, 2009

  
\_\_\_\_\_  
JEFFREY S. WHITE, Judge  
United States District Court