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15 Attorneys for Defendants  
 CHEVRON ENERGY TECHNOLOGY  
 16 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 RE: BRIEFING SCHEDULE ON  
 MOTION FOR SUMMARY JUDGMENT**

23 **v.**

24 **CHEVRON RESEARCH & TECHNOLOGY  
 and JIM EVERARD,**

**Trial Date: June 15, 2009**

25 **Defendants.**  
 26 \_\_\_\_\_/

1 The parties, Plaintiff STEPHEN VALLIMONT (“Plaintiff”) and Defendants CHEVRON  
 2 RESEARCH & TECHNOLOGY and JIM EVERARD (“Defendants”), do by and through their  
 3 respective counsel, stipulate and agree that based upon the original hearing date of April 24,  
 4 2009 for Defendant’s Motion for Summary Judgment, which the court by order dated March  
 5 16, 2009 continued to May 29, 2009, that Plaintiff’s opposition to Defendant’s Motion for  
 6 Summary Judgment shall be filed by no later than April 3, 2009, which is 21 days prior to the  
 7 April 24, 2009 hearing date and the original due date for said opposition, and Defendant’s reply  
 8 brief shall be filed by no later than April 10, 2009.  
 9

10 The parties make this request for several reasons, including because: (1) the above  
 11 briefing schedule is the same as the briefing schedule based upon the April 24, 2009 hearing  
 12 date; and (2) Plaintiff’s lead counsel is unavailable on March 27-30 because she is conducting a  
 13 deposition out of state for a witness in another matter who will be unavailable after March 30,  
 14 2009 and as such, the deposition cannot be changed.  
 15

16 Dated: March 16, 2009

HUBER LAW FIRM

17  
 18 By: \_\_\_\_\_/s/\_\_\_\_\_  
 19 Beth Huber  
 20 Attorneys for Plaintiff,  
 21 STEPHEN VALLIMONT

22 Dated: \_\_\_\_\_, 2009

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

23 By: \_\_\_\_\_/s/\_\_\_\_\_  
 24 Robert D. Eassa  
 25 Delia A. Isvoranu  
 26 Attorneys for Defendants,  
 27 CHEVRON RESEARCH & TECHNOLOGY  
 28 and JIM EVERARD

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

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

**IT IS HEREBY ORDERED** that Plaintiff's opposition brief to Defendant's Motion for Summary Judgment shall be filed by no later than April 3, 2009 and Defendant's reply brief shall be filed by no later than April 10, 2009.

DATED: March 17, 2009

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