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15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA

(San Francisco Division)

18 LISA HERRMANN,

19
 20 Plaintiff(s),

21 vs.

22 LANIER WORLDWIDE, INC.,

23 Defendant(s).

CASE NO.: C 08-02135 EDL

E-FILING CASE

**STIPULATION AND [PROPOSED] ORDER
 TO CONTINUE THE TRIAL DATE AND
 ALL RELATED PRETRIAL DEADLINES
 AS MODIFIED**

Trial Date: April 27, 2009

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 26 Plaintiff Lisa Herrmann and Defendant Ricoh Americas Corporation (erroneously sued as
 27 Lanier Worldwide, Inc.), collectively referred to herein as "the Parties," submit the following
 28 Stipulation and Proposed Order for the Court's consideration:

1 1. **WHEREAS** the Parties have agreed to participate in a private mediation in an
2 attempt to resolve this litigation; and

3 2. **WHEREAS** the Parties have scheduled a mediation for December 8, 2008 with
4 mediator Jeffrey Ross, Esq., that date being the first date acceptable for the Parties and Mr. Ross
5 in light of various trial calendars and Mr. Ross's availability; and

6 3. **WHEREAS** the close of non-expert discovery is currently set for December 1,
7 2008 under the Case Management and Pretrial Order for Jury Trial issued by the Court on August
8 5, 2008 ("Pre-Trial Order"); and

9 4. **WHEREAS** the deadline to file and serve dispositive motions is currently set for
10 December 16, 2008 under the Pre-Trial Order; and

11 5. **WHEREAS** the parties wish to focus their efforts and resources on the successful
12 mediation of this matter without compromising their ability to adequately prepare for trial should
13 this matter not be resolved at mediation (including additional discovery and/or the filing of
14 dispositive motions); and

15 6. **WHEREAS** the current trial date and resulting pretrial deadlines as stated in the
16 Pre-Trial Order makes it very difficult, if not impossible to achieve this goal as stated above in
17 Paragraph 5:

18 **NOW THEREFORE**, the Parties hereby agree and stipulate that the trial date and all
19 related pre-trial deadlines be continued by two months as follows:

Event	Existing Deadline Per The Court's 8/5/08 Order	Proposed and Stipulated Deadline
Jury Trial	April 27, 2009	June 29, 2009
Close of Non-Expert Discovery	December 1, 2008	February 2, 2009
Initial Expert Disclosures	January 20, 2009	March 20, 2009
Rebuttal Expert Disclosures	February 3, 2009	April 3, 2009

Event	Existing Deadline Per The Court's 8/5/08 Order	Proposed and Stipulated Deadline
Close of Expert Discovery	February 24, 2009	April 24, 2009
Last Day to Hear Dispositive Motions	January 20, 2009 at 2:00 p.m.	March 17, 2009
Last Day to File & Serve Dispositive Motions (35)	December 16, 2008	February 10, 2009
Last Day to File & Serve Any Opposition to Dispositive Motions (21)	December 31, 2008	February 24, 2009
Last Day to File & Serve Any Reply to Opposition (14)	January 6, 2009	March 3, 2009
Pretrial Conference	April 7, 2009 at 2:00 p.m.	June 9, 2009 May 26, 2009

IT IS SO STIPULATED.

DATED: October 10, 2008

CURIALE DELLAVERSON HIRSCHFELD
& KRAEMER, LLP

By: /s/ Geoffrey M. Hash

GEOFFREY M. HASH
Attorneys for Defendant
RICOH AMERICAS CORPORATION
(erroneously sued as LANIER WORLDWIDE,
INC.)

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DATED: October 10, 2008

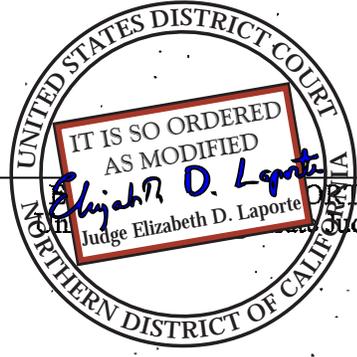
RUKIN HYLAND DORIA & TINDALL LLP

By: 
STEPHANIE A. DORIA
Attorneys for Plaintiff
LISA HERRMANN

ORDER

IT IS SO ORDERED:

Dated: October 28, 2008

By: 
JUDGE