

1 GAIL C. TRABISH, ESQ. (#103482)  
 BOORNAZIAN, JENSEN & GARTHE  
 2 A Professional Corporation  
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 4 Telephone: (510) 834-4350  
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5 Attorneys for Defendant  
 6 TARGET STORES, a division  
 of Target Corporation, erroneously  
 7 sued herein as Target Corporation

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA

11	JENNIE OCHOA,	)	Case No.: Case No.: C-08-02580 MEJ
12	Plaintiff,	)	<b>STIPULATION AND <del>[PROPOSED]</del> ORDER TO EXTEND DISCLOSURE OF EXPERT WITNESSES AND REPORTS AND REBUTTAL WITNESSES</b>
13	vs.	)	
14	TARGET CORPORATION, and DOES 1-20,	)	
15	inclusive,	)	
16	Defendants.	)	
		)	Complaint Filed: April 8, 2008

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18 The plaintiff, by and through her attorney, Brian T. Flahavan, and defendant, by and  
 19 through its attorney, Gail C. Trabish, hereby stipulate to extend Expert Disclosure and Reports  
 20 from December 1, 2008 to December 9, 2008 and Disclosure of Rebuttal Experts from December  
 21 11, 2008 to December 19, 2008. Said extensions are necessary because the medical records  
 22 subpoenaed from Kaiser have not yet been received, and defendant's IME doctor, Dr. Peter  
 23 Slabaugh, will require full records prior to writing his report. It is expected that these records will  
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1 be received shortly. In addition, the matter is scheduled for mediation on December 5, 2008.

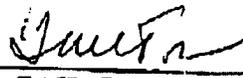
2  
3 DATED: November 24, 2008

FLAHAVAN LAW OFFICES

4  
5 By:   
6 BRIAN T. FLAHAVAN, ESQ.  
7 Attorneys for Plaintiff  
8 JENNIE OCHOA

9 DATED: November 24, 2008

BOORNAZIAN, JENSEN & GARTHE  
A Professional Corporation

10  
11 By:   
12 GAIL C. TRABISH, ESQ.  
13 Attorneys for Defendant  
14 TARGET STORES, a division of  
15 Target Corporation, erroneously sued  
16 herein as Target Corporation

17  
18 **ORDER**

19 Said disclosure deadlines are hereby extended. The new deadlines are as follows:

- |                                      |                   |
|--------------------------------------|-------------------|
| 20 1. Expert Disclosure and Reports  | December 9, 2008  |
| 21 2. Disclosure of Rebuttal Experts | December 19, 2008 |

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23 IT IS SO ORDERED.

24 Dated: December 1, 2008

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26 U.S. MAGISTRATE  
27 MARIA ELENA JAMES

28 254141449324

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**CERTIFICATE OF SERVICE  
(28 U.S.C. §1746)**

I am employed in the County of Alameda, State of California. I am over the age of 18 years and not a party to the within action. My business address is 555 12th Street, Suite 1800, P. O. Box 12925, Oakland, California 94604-2925.

I am readily familiar with the business practice for collection and processing of correspondence for mailing with the United States Postal Service. On the date indicated below, at the above-referenced business location, I sealed envelopes, enclosing a copy of the **STIPULATION AND [PROPOSED] ORDER TO EXTEND DISCLOSURE OF EXPERT WITNESSES AND REPORTS AND REBUTTAL WITNESSES**, addressed as shown below, and placed them for collection and mailing following ordinary business practices to be deposited with the United States Postal Service on the date indicated below:

Brian T. Flahavan, Esq.  
Flahavan Law Offices  
509 Seventh Street  
Santa Rosa, CA 95401  
(707) 525-2917 Phone  
(707) 525-2918 Fax

**Attorneys for Plaintiff**

I declare under penalty of perjury that the foregoing is true and correct. Executed at Oakland, California on November 25, 2008.

  
ALEXINE BRAUN

25414449324