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10 Attorneys for Plaintiff and Counter-Defendant,
 11 CONNET & COMPANY LLC

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA

14 CONNET & COMPANY LLC,
 15
 16 Plaintiff,

17 vs.

18 SCOTT E. UHRIG, an individual,
 WHITEROCK PARTNERS, an unknown
 Texas business entity, STEPHANIE A.
 19 YOUNG, an individual, TINA C. MOLOCK,
 an individual, and DOES 1-50,
 20
 21 Defendant.

) Case No.: C083366-MMC

) **STIPULATED REQUEST AND ORDER**
) **CHANGING TIME**

22 AND RELATED CROSS-ACTIONS

23
 24 All parties hereby jointly request an order changing time in order to extend the non-
 25 expert discovery cut-off date by sixty (60) days, from May 22, 2009 to July 21, 2009. All other
 26 dates set forth in the Pretrial Preparation Order shall remain the same. This request is reasonable
 27 and appropriate based on the following:
 28

1 On or about February 18, 2009, Kevin Hughey and Sarah Hartmann associated in as
2 counsel for Plaintiff and have since taken the role of lead trial counsel. (Declaration of Kevin
3 Hughey in Support of Stipulated Request ("Hughey Decl."), ¶ 2.)

4 Early on the parties agreed to participate in private mediation; however due to the
5 mediator's scheduling conflicts the mediation did not take place until March 9, 2009. Since the
6 mediation the parties have been and continue to be involved in settlement discussions. (Hughey
7 Decl., ¶ 3.) This case involves difficult and complex issues and the parties desire to continue
8 settlement discussions without having to simultaneously engage in costly discovery due to the
9 coming discovery cut-off. (Hughey Decl., ¶ 3.)

10 There have been no prior modifications of time in this case, either by stipulation or
11 Court order. (Hughey Decl., ¶ 4.)

12 The parties do not believe the requested time modification would have any effect on the
13 remaining case schedule. (Hughey Decl., ¶ 5.)

14
15 DATED: March 25, 2009

BULLIVANT HOUSER BAILEY, PC

16
17 By _____

Kevin Hughey
Sarah R. Hartmann

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19 Attorneys for Plaintiff and Counter-Defendant
20 CONNET & COMPANY LLC

21 DATED: March 23, 2009

HOGUE, FENTON, JONES & APPEL, INC.

22
23 By _____

Jonathan D. Hicks

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25 Attorneys for Defendant and Counter-Claimant
26 TINA C. MOLOCK
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DATED: March 25, 2009

THE MAJORIE FIRM LTD.

By *FB*
Francis B. Majorie, P.C.
Pro Hac Vice

Attorneys for Defendant and Counter-Claimant
SCOTT E. UHRIG, individually and d/b/a
WHITE-ROCK PARTNERS

DATED: March 24, 2009

OWENS PARABICH LLP

By *DR*
David R. Owens

Attorneys for Defendant
STEPHANIE A. YOUNG

THE FOREGOING STIPULATION IS HEREBY APPROVED AND IS SO
ORDERED. The deadline to complete non-expert discovery is hereby extended from May 22,
2009 to July 21, 2009.; however, said extension, by itself, shall not constitute good cause
to continue any other deadline or date.

DATED: March 26, 2009

By: *Mafine M. Cheney*
UNITED STATES DISTRICT JUDGE