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18 UNITED STATES DISTRICT COURT  
 19 NORTHERN DISTRICT OF CALIFORNIA

20 MEHDI SABERI,  
 21  
 Plaintiff,  
 22  
 vs.

23 BFS RETAIL & COMMERCIAL  
 24 OPERATIONS, LLC,  
 25 Defendant.

Case No. 08-CV-4232-JL

**STIPULATION AND ~~PROPOSED~~ ORDER  
 TO EXTEND DEADLINES FOR MOTIONS  
 IN LIMINE AND EXPERT DISCOVERY**

Before the Honorable James Larson

Date Action Filed: September 8, 2008  
 Trial Date: October 18, 2010

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1 Plaintiff Medhi Saberi (“Plaintiff”), Defendant BFS Retail & Commercial Operations,  
2 LLC (“BFRC”), and Defendant Dana Girard (“Girard”) by and through their respective counsel,  
3 hereby stipulate as follows:

4 WHEREAS, the parties are awaiting the outcome of this Court’s ruling on Defendants  
5 BFRC and Girard’s Motions for Summary Judgment;

6 WHEREAS, experts and rebuttal experts have already been disclosed and the current  
7 deadline for completion of expert discovery is July 30, 2010;

8 WHEREAS, the current deadline for filing motions in limine (except with respect to expert  
9 issues and issues that arise later as a result of pre-trial disclosures) is July 21, 2010;

10 WHEREAS, all parties would like to avoid incurring expenses associated with conducting  
11 expert discovery and drafting motions in limine without the benefit of the Court’s ruling on  
12 Defendants BFRC and Girard’s Motions for Summary Judgment;

13 NOW, THEREFORE, the parties hereby stipulate and agree, upon order of this Court, to  
14 modify the following deadlines for expert discovery and motions in limine, as previously set forth  
15 in the Stipulation and Order issued on April 29, 2010 (Dkt #104), as follows:

- 16 1. August 6: the last day to complete discovery from expert witnesses;
- 17 2. August 13: the last day to file joint or individual statements relating to expert  
18 discovery pursuant to the procedures set forth in the Amended Pretrial Order (Dkt  
19 #56);
- 20 3. August 4: the last day to file motions in limine (except with respect to expert issues  
21 and issues that arise later as a result of pre-trial disclosures);
- 22 4. August 18, 2010: the last day to file oppositions to motions in limine;
- 23 5. August 25, 2010: the last day to file a replies regarding motions in limine;
- 24 6. September 8, 2010: motions in limine filed pursuant to this schedule shall be heard  
25 on this date, or as ordered by the court.

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1 Except as set out in this Stipulation and Order, all deadlines, orders and requirements set forth in  
2 the Stipulation and Order issued on April 29, 2010 (Dkt #104) shall remain in effect.

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4 Dated: July 6, 2010

Dated: July 6, 2010

5 **CORNERSTONE LAW GROUP**

**RUTAN & TUCKER, LLP**

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7 \_\_\_\_\_ /s/  
8 By: Harry G. Lewis  
9 Attorneys for Plaintiff  
MEHDI SABERI

\_\_\_\_\_ /s/  
By: Summer Young Agriesti  
Attorneys for Defendant  
BFS RETAIL & COMMERCIAL  
OPERATIONS, LLC

10  
11 Dated: July 6, 2010

12 **GCA LAW PARTNERS LLP**

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14 \_\_\_\_\_ /s/  
15 By: Kimberly A. Donovan  
16 Attorneys Defendant  
DANA GIRARD

17 IT IS SO ORDERED.

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19 By:   
The Honorable Judge James Larson

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