

1 MELINDA S. RIECHERT, State Bar No. 065504  
 2 MICHELLE A. GRIFFITH-JONES, State Bar No. 259914  
 3 MORGAN, LEWIS & BOCKIUS LLP  
 4 2 Palo Alto Square  
 5 3000 El Camino Real, Suite 700  
 6 Palo Alto, CA 94306-2122  
 7 Tel: 650.843.4000  
 8 Fax: 650.843.4001  
 9 Email: mrieichert@morganlewis.com  
 10 mgriffithjones@morganlewis.com

11 Attorneys for Defendant  
 12 BAYER HEALTHCARE LLC

13 KENNETH C. ABSALOM, State Bar No. 114607  
 14 LAW OFFICES OF NEVIN & ABSALOM  
 15 22 Battery Street, Suite 333  
 16 San Francisco, California 94111  
 17 Telephone: (415) 392-5040  
 18 Facsimile: (415) 392-3729  
 19 Email: kenabsalom@333law.com

20 Attorneys for Plaintiff  
 21 SEMHAL SIRAJ

22 UNITED STATES DISTRICT COURT  
 23 NORTHERN DISTRICT OF CALIFORNIA  
 24 SAN FRANCISCO DIVISION

25 SEMHAL SIRAJ,  
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 27 Plaintiff,  
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 vs.  
 BAYER HEALTHCARE LLC and DOES  
 1 through 20,  
 Defendants.

Case No. 3:09-cv-00233-SI

**JOINT STIPULATION AND [PROPOSED]  
 ORDER EXTENDING SUMMARY  
 JUDGMENT DEADLINES**

Complaint Filed: December 18, 2008  
 Trial Date: April 12, 2010

1 Plaintiff Semhal Siraj (“Plaintiff”) and Defendant Bayer HealthCare LLC (“Defendant”),  
2 collectively referred to as the “Parties,” by and through their undersigned counsel, file this  
3 stipulation to extend the deadlines related to summary judgment motions:

4 WHEREAS, Plaintiff filed her Complaint on December 18, 2008;

5 WHEREAS, on May 6, 2009, the Court issued a Pretrial Preparation Order ordering  
6 dispositive motions to be filed by November 13, 2009; opposition papers to be filed by November  
7 30, 2009; reply papers to be filed by December 7, 2009; and the hearing to be scheduled no later  
8 than December 18, 2009;

9 WHEREAS, the Court’s May 6, 2009 Order set trial for March 22, 2010, with the pretrial  
10 conference set for March 9, 2010;

11 WHEREAS, on August 18, 2009, the Court continued the trial date to April 12, 2010,  
12 continued the date for the pre-trial conference to March 30, 2010, and did not continue the  
13 summary judgment deadlines;

14 WHEREAS, on October 8, 2009, the Court ordered the Parties to participate in a  
15 settlement conference on January 7, 2010;

16 WHEREAS, the Parties have stipulated to a continuance of the deadlines for the motions  
17 for summary judgment in order to complete discovery and engage in good faith settlement  
18 discussions prior to filing dispositive motions;

19 WHEREAS, neither party has been or will be prejudiced by the continuation of these  
20 litigation deadlines;

21 WHEREAS, the Parties’ stipulation does not affect the trial date or date for pre-trial  
22 conference;

23 THEREFORE, the Parties request that the Court approve the following litigation  
24 deadlines:  
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Event	Old deadline	New deadline
Last day to file Notice of Motion for Summary Judgment:	11/13/2009	01/22/2010
Last day to file Opposition to Motion for Summary Judgment	11/30/2009	02/05/2010
Last day to file Reply to Opposition of Motion for Summary Judgment	12/07/2009	02/12/2010
Hearing on Motion for Summary Judgment	12/18/2009	02/26/2010

**IT IS SO STIPULATED.**

Dated: November 5, 2009

LAW OFFICES OF NEVIN & ABSALOM

By /s/James Achermann

Jim Achermann  
Attorneys for Plaintiff  
SEMHAL SIRAJ

Dated: November 5, 2009


MORGAN, LEWIS & BOCKIUS LLP

By /s/Michelle A. Griffith-Jones

Michelle A. Griffith-Jones  
Attorneys for Defendant  
BAYER HEALTHCARE LLC

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

By   
The Honorable Susan Illston  
United States District Court Judge