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 14 **UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF**
 15 **CALIFORNIA SAN FRANCISCO DIVISION**
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18 SEMHAL SIRAJ, 19 20 Plaintiff, 21 vs. 22 BAYER HEALTHCARE, LLC, AND DOES 23 1 THROUGH 20., 24 Defendant) 3:09-CV-09 0233-SI)) JOINT STIPULATION AND) [PROPOSED] ORDER EXTENDING) DAMAGES EXPERT DEADLINES))) Complaint filed: December 18, 2008) Trial Date: April 12, 2010)
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25 Plaintiff Semhal Siraj (“Plaintiff”) and Defendant Bayer HealthCare LLC (“Defendant”),
 26 collectively referred to as the “Parties,” by and through their undersigned counsel, file this
 27 stipulation to extend the deadlines related to Disclosure of Liability Experts:
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WHEREAS, Plaintiff filed her Complaint on December 18, 2008;

1 WHEREAS, on May 6, 2009, the Court issued a Pretrial Preparation Order ordering
2 Designation of Damages Experts on January 8, 2010, Rebuttal Damages Expert on January 19,
3 2010, and Damage Expert Discovery Cutoff on January 29, 2010;

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

6 WHEREAS, on August 18, the Court continued the trial date to April 12, 2010, continued
7 the date for pre-trial conference to March 30, 2010;

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

10 WHEREAS, On November 6, 2009 the Court continued the deadlines for motions for
11 Summary Judgment to January 22, 2010, Opposition to Motion for Summary Judgment on
12 February 5, 2010, Reply to Opposition to Motion for Summary Judgment on February 12, 2010,
13 and the Hearing on Motion for Summary Judgment on February 26, 2010;

14 WHEREAS, On December 2, 2009 the Court ordered the Parties to participate in a
15 settlement conference January 19, 2010;

16 WHEREAS, the Parties have stipulated to a continuance of the deadlines for Damages
17 Experts in order to engage in good faith settlement discussions prior to obtaining and disclosing
18 and engaging in discovery of Damages Experts;

19 WHEREAS, neither party has been or will be prejudiced by the continuance 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:

EVENT	OLD DEADLINE	NEW DEADLINE
Last Day to Designate Damages Expert	1/08/2010	1/29/2010
Last Day to Designate Rebuttal Damages Expert	1/19/2010	2/11/2010
Last Day for Damages Expert Discovery	1/29/2010	2/21/2010

IT IS SO STIPULATED.

Dated: December 31, 2009

LAW OFFICES OF NEVIN & ABSALOM

By /s/ James J. Achermann
James J. Achermann
Attorney for Plaintiff
SEMHAL SIRAJ


Dated: December 31, 2009

MORGAN, LEWIS & BOCKIUS LLP

By /s/ Michelle Griffith-Jones
Michelle A. Griffith-Jones
Attorney for Defendant
BAYER HEALTHCARE LLC

IT IS SO ORDERED.

Dated _____

By 
The Honorable Susan Illston
United States District Court Judge