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Attorneys for Plaintiff  
Frank Schaffner

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

Frank Schaffner,

Plaintiff,

v.

Crown Equipment Corporation dba Crown  
Lift Trucks,

Defendants.

Case No. CV-09-00284 VRW

**STIPULATION AND ~~PROPOSED~~  
ORDER EXTENDING DISCOVERY AND  
PRETRIAL DEADLINES**

1 In light of trials in other matters and ongoing discovery disputes on which the parties  
2 have been meeting and conferring, the parties hereby stipulate and respectfully request  
3 that the Court enter an order that the schedule of discovery and pretrial deadlines in this  
4 case be modified as follows:  
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6 Fact Discovery Cutoff: August 10, 2010

7 Designation of Experts/Reports: October 15, 2010

8 Rebuttal Experts/Reports: December 10, 2010

9 Expert Discovery Cutoff: January 28, 2011

10 Dispositive Motions Hearing: March 17, 2011

11 Pretrial Conference: April 21, 2011  
12

13  
14 Dated: March 23, 2010

/s/

Daniel R. Weltin, Esq.  
Kevin P. McLaughlin, Esq.  
WELTIN · STREB & WELTIN LLP  
For Plaintiff Frank Schaffner

15  
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17  
18 Dated: March 23, 2010

/s/

Kenneth E. Keller, Esq.  
Michael D. Lisi, Esq.  
KRIEG, KELLER, SLOAN, REILLEY &  
ROMAN LLP  
For Defendant Crown Equipment Corp.

1 Based upon the stipulation of the parties, the Court hereby sets the following  
2 discovery deadlines:

3 Fact Discovery Cutoff: August 10, 2010

4 Designation of Experts/Reports: October 15, 2010

5 Rebuttal Experts/Reports: December 10, 2010

6 Expert Discovery Cutoff: January 28, 2011

7 Dispositive Motions Hearing: March 17, 2011 at 10:00 AM.

8 Pretrial Conference: April 21, 2011 at 3:30 PM.

9 IT IS SO ORDERED.  
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12 Dated: March 30, 2010

