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 25 RJL, INC. dba Zelda's Restaurant

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CHRISTINA ADAMS,

Plaintiff,

vs.

ZELDA'S RESTAURANT; CAPITOLA RJL,
 INC. dba ZELDA'S RESTAURANT; JOHN
 EALY; RICHARD J. BREGANTE; and DOES
 1-10, inclusive,

Defendants.

Case No.: CV 09-01275 JCS

**STIPULATION TO CONTINUE
 DISCOVERY AND MOTION DEADLINES;
 AND ORDER (~~PROPOSED~~)**

1 WHEREAS, the parties are actively engaged in settlement negotiations under Magistrate
2 Judge Laurel D. Beeler;

3 WHEREAS, Magistrate Beeler has requested that the parties refrain from conducting
4 discovery and motion practice at this time;

5 WHEREAS, defendant John Ealy is recovering from heart surgery;

6 IT IS HEREBY STIPULATED by and among Plaintiff CHRISTINA ADAMS and
7 Defendants CAPITOLA RJL, INC. dba ZELDA'S RESTAURANT; JOHN T. EALY; and
8 RICHARD J. BREGANTE, through their designated counsel, the Date for the Designation of
9 Experts be continued from July 22 to August 26, that the Discovery Cutoff, including expert
10 discovery, be continued from July 22, 2011 to September 21, 2011, ~~that the last day to file and~~
11 ~~serve dispositive motions be continued from August 19, 2011, to October 13, 2011, and the Last~~
12 ~~Day to Hear Motions be continued from September 23, 2011 at 9:30 a.m. to November 18, 2011 at~~
13 ~~9:30 a.m.~~

14 Dated: July 15, 2011

PAUL L. REIN, ESQ.
CELIA McGUINNESS, ESQ.
LAW OFFICES OF PAUL L. REIN

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By: /s/Celia McGuinness
Attorneys for Plaintiff CHRISTINA ADAMS

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18 Dated: July 15, 2011

JEFFREY H. BARABAN, ESQ.
JAMES M. LINK, ESQ.
BARABAN & TESKE

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By: James M. Link
Attorneys for Defendants ZELDA'S
RESTAURANT; CAPITOLA RJL, INC. dba
ZELDA'S RESTAURANT; JOHN EALY;
and RICHARD J. BREGANTE

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24 Dated: July 15, 2011

MICHAEL D. BRUNO
GORDON & REES LLP

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By: /s/Michael D. Bruno
Attorneys for Defendants ZELDA'S
RESTAURANT; CAPITOLA RJL, INC. dba
ZELDA'S RESTAURANT; JOHN EALY;
and RICHARD J. BREGANTE

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~~[PROPOSED ORDER]~~

Pursuant to the stipulation of the parties and for GOOD CAUSE SHOWN, it is hereby ordered that the Date for the Designation of Experts be continued from July 22 to August 26, that the Discovery Cutoff, including expert discovery be continued from July 22, 2011 to September 21, 2011, ~~that the last day to file and serve dispositive motions be continued from August 19, 2011, to October 13, 2011, and that the Last Day to Hear Motions be continued from September 23, 2011 at 9:30 a.m. to November 18, 2011 at 9:30 a.m.~~

Dated: July 19, 2011

