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DEVELOPMENT RETAIL, LLC dba
8 GHIRARDELLI SQUARE GARAGE; JMA
VENTURES LLC; and COCOA PRC II
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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13

14 SEBASTIAN DEFRANCESCO,

15 Plaintiff,

16 v.

17 COCOA DEVELOPMENT RETAIL, LLC
dba GHIRARDELLI SQUARE GARAGE;
18 JMA VENTURES LLC; COCOA PRC II; and
DOES 1-10, Inclusive,
19

20 Defendants.
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Case No. C09-02044 (MHP)

**STIPULATION AND ~~PROPOSED~~
ORDER ENLARGING TIME TO
PROVIDE INITIAL DISCLOSURES
(LOCAL RULE 6-1(a))**

1 WHEREAS, Plaintiff recently filed a First Amended Complaint that, among other things,
2 added a new defendant;

3 WHEREAS, that new defendant would (under Rule 26(f)) have thirty days after being
4 served to provide initial disclosures;

5 WHEREAS, counsel for defendants wishes to provide the initial disclosures for all
6 defendants (including the new defendant) at the same time;

7 WHEREAS, the parties are attempting to resolve the matter informally and have scheduled
8 a September 2, 2009, site inspection;

9 WHEREAS, the parties have stipulated to extend the deadline to provide initial disclosures
10 through and including October 2, 2009.

11 IT IS HEREBY STIPULATED by and between Plaintiff SEBASTIAN DEFRANCESCO
12 ("Plaintiff") and Defendants COCOA DEVELOPMENT RETAIL, LLC, JMA VENTURES, LLC
13 and COCOA PRC II, LLC that all of the parties' time to provide initial disclosures pursuant to
14 Federal Rule of Civil Procedure 26(a) and General Order No. 56 shall be enlarged and extended to
15 and including October 2, 2009.

16 IT IS SO STIPULATED.

17
18 DATED: August 28, 2009

COBLENTZ, PATCH, DUFFY & BASS LLP

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20 By: /s/ Clifford E. Yin

Clifford E. Yin
Attorneys for Defendants COCOA
DEVELOPMENT RETAIL, LLC dba
GHIRARDELLI SQUARE GARAGE; JMA
VENTURES LLC; and COCOA PRC II

21
22
23 DATED: August 28, 2009

LAW OFFICES OF PAUL L. REIN

24
25
26 By: _____

Paul L. Rein
Attorneys for Plaintiff
SEBASTIAN DEFRANCESCO

27
28

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1 WHEREAS, Plaintiff recently filed a First Amended Complaint that, among other things,
2 added a new defendant;

3 WHEREAS, that new defendant would (under Rule 26(f)) have thirty days after being
4 served to provide initial disclosures;

5 WHEREAS, counsel for defendants wishes to provide the initial disclosures for all
6 defendants (including the new defendant) at the same time;

7 WHEREAS, the parties are attempting to resolve the matter informally and have scheduled
8 a September 2, 2009, site inspection;

9 WHEREAS, the parties have stipulated to extend the deadline to provide initial disclosures
10 through and including October 2, 2009.

11 IT IS HEREBY STIPULATED by and between Plaintiff SEBASTIAN DEFRANCESCO
12 ("Plaintiff") and Defendants COCOA DEVELOPMENT RETAIL, LLC, JMA VENTURES, LLC
13 and COCOA PRC II, LLC that all of the parties' time to provide initial disclosures pursuant to
14 Federal Rule of Civil Procedure 26(a) and General Order No. 56 shall be enlarged and extended to
15 and including October 2, 2009.

16 IT IS SO STIPULATED.

18 DATED: August 27, 2009

COBLENTZ, PATCH, DUFFY & BASS LLP

20 By: _____

21 Clifford E. Yin
22 Attorneys for Defendants COCOA
23 DEVELOPMENT RETAIL, LLC dba
24 GHIRARDELLI SQUARE GARAGE; JMA
25 VENTURES LLC; and COCOA PRC II

24 DATED: August 27, 2009

LAW OFFICES OF PAUL L. REIN

26 By: _____

27 Paul L. Rein
28 Attorneys for Plaintiff
SEBASTIAN DEFRANCESCO

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 8/31, 2009

