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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Gillian M. Ross, Bar No. 127116 Eugene M. Pak, Bar No. 168699 Gregory K. Jung, Bar No. 203350 WENDEL, ROSEN, BLACK & DEAN LLP 1111 Broadway, 24th Floor Oakland, California 94607 Telephone: (510) 834-6600 Fax: (510) 834-1928 Email: epak@wendel.com Attorneys for Defendants Mohammed Karwash and Hassan Ibrahim UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION BELCAN ENGINEERS, Plaintiff, vs. MOHAMMED KARWASH, TOM LINN dba TOM LINN DRAFTING & DESIGN, JOSE JIMENEZ dba J&M DESIGN, NS. MOHAMMED KARWASH, TOM LINN dba TOM LINN DRAFTING & DESIGN, JOSE JIMENEZ dba J&M DESIGN, JOSE JIMENEZ AB J&M DESIGN, Defendants.		
20 21			
21	Pursuant to Local Rule 16-2(d), Plaintiff Belcan Engineers ("Plaintiff") and Defendants		
23	Mohammed Karwash and Hassan Ibrahim ("Defendants") (collectively referred to as the		
24	"Parties") hereby stipulate and jointly request that the deadlines in this action be extended. <sup>1</sup>		
25	Good cause exists for such extension as the Parties have reached a settlement and are in the		
26	process of memorializing this settlement in writing, and Defendant Mohammed Karwash is out of		
27	the country on an extended trip. In light of the	nis, the Parties respectfully request that the Court's	
28	$\frac{1}{1}$ The other defendants in this action ha	ve not appeared and have defaulted	
86058.2	STIPULATED MOTION TO AMEND CASE MANAGEMENT CONFERENCE ORDER SCHEDULE - Case No. CV 03 2891 EDL	ve not appeared and have defaulted.	

2	Parties request that the current deadlines in this action be re-set for three months as follows:			
3	Event	Current Deadline	Proposed Deadline	
4	Fact Discovery Cut-Off	April 27, 2012	July 27, 2012	
5	Expert Disclosure	June 1, 2012	September 1, 2012	
6	Rebuttal Expert Disclosure	June 20, 2012	September 20, 2012	
7	Joint Statement	July 6, 2012	October 5, 2012	
8	Further Status Conference	July 13, 2012 at 10:30 a.m.	October 12, 2012 at 10:30 a.m.	
9	Expert Discovery Cutoff	July 20, 2012	October 19, 2012	
10	Dispositive Motion Deadline	August 3, 2012	November 2, 2012	
11	Meet and Confer	October 23, 2012	January 22, 2013	
12	Pretrial Conference	October 23, 2012 at 3:00 p.m.	January 22, 2013 at 3:00 p.m.	
13	Trial	November 5, 2012	February 4, 2013 at 9 a.m.	
14			(3 days)	
15				
16	SO STIPULATED BY:			
17	Dated: April 23, 2012	ed: April 23, 2012 WENDEL, ROSEN, BLACK & DEAN LLP		
18				
19	By: /s/ Eugene M. Pak			
20	Eugene M. Pak Attorneys for Defendants			
21	Mohammed Karwash and Hassan Ibrahim			
22	Dated: April 23, 2012	2012 THE MORALES LAW FIRM		
23				
24	By: /s/ David P. Morales			

October 14, 2011 Case Management Conference Order be amended to re-set deadlines. The

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STIPULATED MOTION TO AMEND CASE MANAGEMENT CONFERENCE ORDER SCHEDULE -Case No. CV 03 2891 EDL

- 2 -

David P. Morales

Attorneys for Plaintiff Belcan Engineers

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1 2	PURSUANT TO STIPULATION, IT IS SO ORDERED, with the exception that the meet and confer date is extended from September 17, 2012 (see Doc. No. 81) <sup>1</sup> to December 17, 2012.
3	Dated: April <u>27</u> , 2012
4	: Mafine M. Chesney
5	Judge Maxine M. Chesney United States District Court Judge
6	United States District Court Judge
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26	<sup>1</sup> It appears the parties, in listing October 23, 2012 as the current meet and confer
27	deadline, were relying on the Clerk's minutes (Doc. No. 80), which contain a typographical error with respect to said deadline. The correct date is set forth in the
28	Court's Pretrial Order (Doc. No. 81).
36058.2	STIPULATED MOTION TO AMEND CASE MANAGEMENT CONFERENCE ORDER SCHEDULE 3 - Case No. CV 03 2891 EDL