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17 Attorneys for Defendants BALWANT S. DENHOY
 18 and SUKHWANT K. DENHOY, as individuals and
 19 as Trustees of THE DENHOY LIVING TRUST,
 20 d.b.a. WILLOW PASS MOBILE HOME PARK, and
 21 NITA DENHOY

22 UNITED STATES DISTRICT COURT
 23 NORTHERN DISTRICT OF CALIFORNIA

24 THERESA HUERTA

25 Plaintiff

26 vs.

27 BALWANT S. DENHOY and SUKHWANT
 28 K. DENHOY, as individuals and as trustees
 of THE DENHOY LIVING TRUST, d.b.a.
 WILLOW PASS MOBILE HOME PARK,
 THE DENHOY LIVING TRUST, NITA
 DENHOY, and DOES 1 THROUGH 10,
 INCLUSIVE,

Defendants.

Case No. C-09-03130 EDL

**FURTHER REVISED
 STIPULATION AND ORDER
 RE EXTENSION OF ALL
 DISCOVERY DEADLINES
 AND OTHER PRETRIAL
 DEADLINES**

Complaint Filed: July 10, 2009
 Trial Date: November 15, 2010

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1 Whereas Plaintiff THERESA HUERTA and Defendants BALWANT S. DENHOY and
2 SUKHWANT K. DENHOY, as individuals and as trustees of THE DENHOY LIVING TRUST,
3 d.b.a. WILLOW PASS MOBILE HOME PARK, THE DENHOY LIVING TRUST and NITA
4 DENHOY [collectively, the Parties] have been diligently pursuing the taking of discovery in the
5 above-entitled action;

6 Whereas the Parties have cooperated in the conduct of discovery, including, by way of
7 example and not by way of limitation, in seeking and granting extensions of time for responding
8 to written discovery, in setting and taking deposition discovery and by entering into the
9 STIPULATION RE THE USE OF DISCOVERY AND EVIDENCE OBTAINED IN THE
10 STATE COURT UNLAWFUL DETAINER ACTION filed March 31, 2010, thereby avoiding the
11 need to take duplicative discovery;

12 Whereas the Parties have by mutual agreement deemed it advantageous to extend all
13 currently ordered discovery deadlines, including the June 2, 2010 deadline to supplement and/or
14 correct all previously made disclosures and discovery responses, as well as deadlines related to
15 dispositive motions, by three weeks; and:

16 Whereas the extension of deadlines as set forth herein is not intended to alter any other
17 current deadlines or the trial date in this case;

18 The Parties by and through their attorneys of record hereby agree and stipulate to
19 extension of discovery deadlines set forth in the Court's CASE MANAGEMENT AND
20 PRETRIAL ORDER FOR JURY TRIAL dated November 3, 2009, as follows:

21 The deadline of Wednesday, June 2, 2010, to supplement and/or correct all previously
22 made disclosures and discovery responses shall be extended to **Wednesday, June 23, 2010**,
23 notwithstanding the fact that said deadline has already passed.

24 The current deadline of Wednesday, June 30, 2010, to complete all non-expert discovery
25 (fact discovery cut-off) shall be extended to **Wednesday, July 21, 2010**.

26 The current deadline of Wednesday, July 7, 2010, to file Motions to compel non-expert
27 discovery (seven days after the fact discovery cut-off, as provided by Local Rule 26-2) shall be
28 extended to **Wednesday, July 28, 2010**.

1 The current deadline of Tuesday, July 13, 2010, for service and filing of moving papers
2 for dispositive motions shall be extended to **Tuesday, July 27, 2010.**

3 The current deadline of Tuesday, July 27, 2010, for service and filing of oppositions to
4 dispositive motions shall be extended to **Tuesday, August 10, 2010.**

5 The current deadline of Tuesday, August 3, 2010, for the filing and service of any reply to
6 opposition to dispositive motion shall be extended to **Tuesday, August 17, 2010.**

7 The current deadline of Tuesday, August 17 2010, for the hearing of dispositive motions
8 shall be extended to **Tuesday, August 31, 2010.**

9 The current deadline of Tuesday, August 17, 2010, to make initial expert disclosures shall
10 be extended to **Tuesday, September 7, 2010.**

11 The current deadline of Tuesday, August 31, 2010, to make Rebuttal expert disclosures
12 shall be extended to **Tuesday, September 21, 2010.**

13 The current deadline of Tuesday, September 14, 2010, to complete all expert discovery
14 (expert discovery cut-off) shall be extended to **Tuesday, October 5, 2010.**

15 The current deadline of Tuesday, September 21, 2010, to file Motions to compel non-
16 expert discovery (seven days after the expert discovery cut-off, as provided by Local Rule 26-2)
17 shall be extended to **Tuesday, October 12, 2010.**

18 This Stipulation relates solely to the extension of discovery deadlines and deadlines
19 related to the filing and hearing of dispositive motions and pretrial submissions. No other
20 specified dates or deadlines, including the Trial date, set forth in the court's Case Management
21 and Pretrial Order for Jury Trial dated November 3, 2009, shall be changed or affected by this
22 Order.

23 Dated: June 7, 2010

SCHIFF HARDIN LLP

24
25 By: _____
26 BRUCE A. WAGMAN
27 Attorneys for Plaintiff
28 THERESA HUERTA

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Dated: June 7, 2010

Law Offices of KAPLAN & SAM

By: _____

BENJAMIN ELLIOT KAPLAN
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BALWANT S. DENHOY and SUKHWANT K.
DENHOY, as individuals and as Trustees of THE
DENHOY LIVING TRUST, d.b.a. WILLOW
PASS MOBILE HOME PARK, and NITA
DENHOY

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 7, 2010

Elizabeth D. Laporte

ELIZABETH D. LAPORTE
United States Magistrate Judge