

1 DAVID J. BECHT, Bar No. 104208  
[dbecht@adamsnye.com](mailto:dbecht@adamsnye.com)  
 2 MICHAEL SACHS, Bar No. 235048  
[msachs@adamsnye.com](mailto:msachs@adamsnye.com)  
 3 MYTHILY SIVARAJAH, Bar No. 252494  
[msivarajah@adamsnye.com](mailto:msivarajah@adamsnye.com)  
 4 ADAMS NYE TRAPANI BECHT LLP  
 222 Kearny Street, Seventh Floor  
 5 San Francisco, CA 94108-4521  
 Telephone: 415.982.8955  
 6 Facsimile: 415.982.2042

7 Attorneys for Plaintiff  
 MARIFI BAUTISTA

8 MICHELLE B. HEVERLY, Bar No. 178660  
[mheverly@littler.com](mailto:mheverly@littler.com)  
 9 ERICA H. KELLEY, Bar No. 221702  
[ekelley@littler.com](mailto:ekelley@littler.com)  
 10 LITTLER MENDELSON  
 A Professional Corporation  
 11 50 W. San Fernando St., 15<sup>th</sup> Floor  
 San Jose, CA 95113-2303  
 12 Telephone: 408.998.4150  
 13 Facsimile: 408.288.5686

14 Attorneys for Defendants  
 AON BENFIELD INC. AND AON SERVICE  
 15 CORPORATION

16 UNITED STATES DISTRICT COURT  
 17 NORTHERN DISTRICT OF CALIFORNIA

18 MARIFI BAUTISTA,  
 19 Plaintiff,

20 v.

21 AON BENFIELD, INC., AON  
 22 SERVICE CORPORATION, AON  
 CORPORATION, and DOES 1  
 23 through 100, inclusive,  
 24 Defendants.

Case No. C 09-03270 MHP

**STIPULATION AND ~~[PROPOSED]~~  
 ORDER TO CONTINUE DISCOVERY  
 CUT-OFF DATE**

1 **TO THE HONORABLE COURT AND THE CLERK OF THE COURT:**

2 **TAKE NOTICE THAT THE** undersigned counsel of record for Plaintiff and  
3 Defendants hereby stipulate and request that the Court enter the following Order forthwith:

4 WHEREAS, the parties have unsuccessfully attempted to mediate the matter and have  
5 agreed that additional discovery is required prior to further settlement discussions;

6 WHEREAS, the parties have been engaged in fact discovery, including exchange of  
7 over 7,000 documents, which are currently being reviewed by the parties;

8 WHEREAS, the parties anticipate that they will be ready to begin taking initial  
9 depositions in August 2010;

10 WHEREAS, the parties expect that they will be prepared to resume settlement  
11 negotiations through mediation in late September or early October;

12 WHEREAS, if the parties are unsuccessful in the second session of mediation, further  
13 discovery will be needed to prepare for summary judgment and/or trial;

14 WHEREAS, the current discovery and dispositive motion schedule does not allow  
15 sufficient time for the parties to complete discovery and engage in mediation;

16 NOW THEREFORE, the parties hereby request, based on the showing of good cause  
17 discussed herein, that the discovery and dispositive motion deadlines be continued as follows:

18 (1) Fact discovery cut-off be moved from September 1, 2010 to December 1,  
19 2010;

20 (2) The dispositive motion filing date be moved from December 1, 2010 to  
21 January 17, 2011;

22 (4) The Expert Disclosure and Exchange of Initial Expert Reports deadline be  
23 moved from September 15, 2010 to December 15, 2010;

24 (5) The Exchange of Rebuttal Expert Reports deadline be moved from October 1,  
25 2010 to January 10, 2011; and

26 (6) The Expert Discovery Cut-Off be moved from November 15, 2010 to  
27 February 15, 2011.

1 All counsel agree that there have otherwise been no changes in the status of the case  
2 since the Case Management Conference and this is the first request for a continuance of dates  
3 requested by the parties.

4 Dated: July 28, 2010

6 / s / Michelle B. Heverly  
7 MICHELLE B. HEVERLY  
8 ERICA H. KELLEY  
9 LITTLER MENDELSON  
10 A Professional Corporation  
11 Attorneys for Defendants  
12 AON BENFIELD INC. AND AON  
13 SERVICE CORPORATION

11 Dated: July 28, 2010

14 / s / Michael Sachs  
15 MICHAEL SACHS  
16 ADAMS NYE TRAPANI BECHT LLP  
17 Attorneys for Plaintiff  
18 MARIFI BAUTISTA

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**ORDER**

**PURSUANT TO THE STIPULATION OF THE PARTIES** to continue the Fact Discovery Cut-Off from September 1, 2010 to November 1, 2010; the dispositive motion filing date from December 1, 2010 to January 17, 2011; the Expert Disclosure and Exchange of Initial Expert Reports deadline from September 15, 2010 to January 15, 2011; the Exchange of Rebuttal Expert Reports deadline from October 1, 2010 to February 1, 2011; and the Expert Discovery Cut-Off from November 15, 2010 to March 1, 2011,

**IT IS SO ORDERED.**

Dated: 7/29/2010

