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6 Attorneys for Defendants,
 Christopher Platt and Avis Rent A Car System, LLC
 7 (erroneously sued herein as Avis Rent a Car System, Inc. and Avis, Inc.)
 8

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11

12 FATEMEH TABRIZI,

13 Plaintiff,

14 vs.

15 CHRISTOPHER PLATT; AVIS RENT A CAR
 SYSTEM, INC; AVIS, INC.; DOES 1 TO 50,

16 Defendants.
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CASE NO. 3:09-CV-04305-MEJ

**STIPULATION AND [PROPOSED] ORDER
 TO MODIFY CASE MANAGEMENT
 (PRETRIAL SCHEDULING) ORDER**

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 19 Plaintiff FATEMEH TABRIZI and Defendants Christopher Platt and Avis Rent A Car
 20 System, LLC, by and through their respective undersigned counsel, hereby enter into the following
 21 stipulation and request to modify the Case Management (Pretrial Scheduling) Order dated December
 22 28, 2009, as follows:

23 1. WHEREAS, the December 28, 2009 Case Management (Pretrial Scheduling) Order
 24 provides that expert witnesses with reports are to be disclosed by May 14, 2010, rebuttal experts are
 25 to be disclosed by May 24, 2010, and closure of discovery (including depositions of expert witnesses)
 26 by June 8, 2010.

27 2. WHEREAS, Plaintiff's deposition has been scheduled for May 18, 2010, for the
 28 convenience of all counsel and the witness.

1 3. WHEREAS, the expert witnesses retained by the parties will need to review the
2 deposition transcript of the Plaintiff, among other documents, to prepare their respective reports.

3 4. WHEREAS, all parties seek to continue the dates for expert disclosure, rebuttal expert
4 disclosure, and closure of discovery date by approximately 45 days, so that Defendants can complete
5 Plaintiff's deposition and then both parties provide said deposition transcript to their respective
6 experts.

7 5. Therefore, the parties respectfully submit that good cause exists and request
8 modification of the scheduling order as follows:

- 9 i. Expert Disclosure: June 28, 2010
- 10 ii. Rebuttal Expert Disclosure: July 8, 2010
- 11 iii. Discovery Closure: July 26, 2010

12 6. All other provisions of the December 28, 2009 Case Management (Pretrial
13 Scheduling) Order remain in effect.

14 **IT IS HEREBY STIPULATED.**

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16 DATED: April 14, 2010

By: /s/ _____
EDWARD GARCIA
Attorney for Defendants
Platt and Avis Rent A Car System, LLC

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18
19 DATED: April 14, 2010

By: /s/ _____
DAVID C. ANDERSON
Attorney for Plaintiff
Fatemeh Tabrizi

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21
22 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

23
24 DATED: April 20, 2010
25 _____



Maria-Elena Jam
Chief United States Magistrate Judge