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9 Attorneys for Defendants,  
10 Christopher Platt and Avis Rent A Car System, LLC  
11 (erroneously sued herein as Avis Rent a Car System, Inc. and Avis, Inc.)

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA

14 FATEMEH TABRIZI,

15 Plaintiff,

16 vs.

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

19 Defendants.

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

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

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

23 1. WHEREAS Chief United States Magistrate Judge Maria-Elena James issued a Case  
24 Management (Pretrial Scheduling) Order in this matter on December 28, 2009, which included dates  
25 for expert disclosure, rebuttal expert disclosure, and closure of discovery date.

26 2. WHEREAS the parties previously submitted a Stipulation and Order to Modify Case  
27 Management (Pretrial Scheduling) Order, and this Court signed the Order on April 20, 2010; and the  
28 modified Case Management (Pretrial Scheduling) Order provides that expert witnesses with reports

1 are to be disclosed by June 28, 2010, rebuttal experts are to be disclosed by July 8, 2010, and closure  
2 of discovery (including depositions of expert witnesses) by July 26, 2010.

3 4. WHEREAS the parties submitted a Second Stipulation and Order to Modify Case  
4 Management (Pretrial Scheduling) Order, and this Court signed the Order, and this Court signed the  
5 Order on June 21, 2010; and the modified Case Management (Pretrial Scheduling) Order provides  
6 that expert witnesses with reports are to be disclosed by July 16, 2010, rebuttal experts are to be  
7 disclosed by July 27, 2010, and closure of discovery (including depositions of expert witnesses) by  
8 August 17, 2010.

9 5. WHEREAS the parties have had further difficulties obtaining complete copies via  
10 subpoena of Plaintiff's medical records and films from the Camino Medical Group.

11 6. WHEREAS Plaintiff's medical records and films from the Camino Medical Group are  
12 needed by the parties to properly evaluate this matter.

13 7. WHEREAS the parties have a mediation scheduled for August 13, 2010.

14 6. WHEREAS all parties seek to continue the dates for expert disclosure, rebuttal expert  
15 disclosure, and closure of discovery date by approximately 30 additional days, so that the parties can  
16 obtain complete copies of Plaintiff's medical records from the Camino Medical Group and also  
17 complete mediation.

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

- 20 i. Expert Disclosure: August 16, 2010
- 21 ii. Rebuttal Expert Disclosure: August 24, 2010
- 22 iii. Discovery Closure: September 15, 2010

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

3  
4 **IT IS HEREBY STIPULATED.**

5  
6 DATED: July 14, 2010


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

7  
8  
9  
10 DATED: July 14, 2010

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

11  
12  
13 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

14  
15 DATED: July 16, 2010

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\_\_\_\_\_  
Maria-Elena James  
Chief United States Magistrate Judge