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

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA

15 FATEMEH TABRIZI,

16 Plaintiff,

17 vs.

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

20 Defendants.

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

**STIPULATION AND ~~PROPOSED~~ ORDER
TO CONTINUE DISCOVERY CLOSURE**

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

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

27 2. WHEREAS the parties previously submitted a Stipulation and Order to Modify Case
28 Management (Pretrial Scheduling) Order, and this Court signed the Order on July 16, 2010; and the
modified Case Management (Pretrial Scheduling) Order provides, in part, closure of discovery

1 (including depositions of expert witnesses) by July 26, 2010.

2 4. WHEREAS the parties have completed disclosure of experts.

3 5. WHEREAS the parties need additional time to schedule and complete the depositions of
4 each sides retained and non-retained experts.

5 6. WHEREAS all parties seek to continue the date for the closure of discovery by
6 approximately 45 additional days so that the parties can complete expert depositions.

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

9 i. Discovery Closure: October 29, 2010

10
11 **IT IS HEREBY STIPULATED.**

12
13 DATED: August 25, 2010

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

16
17 DATED: August 25, 2010

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

20 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

21
22 DATED: August 26, 2010

23 
24 _____
24 Maria-Elena Jimenez
25 Chief United States Magistrate Judge